

Van Waters & Rogers Inc.

Personnel Training

(40 CFR 122.25(a)(12))

VW&R is an established major distributor and repacker of a wide variety of industrial chemicals and solvents, many of which are hazardous (flammable, corrosive, toxic, oxidative); consequently, the Company has long had in place a training program designed to acquaint its employees with the dangers of these hazardous materials and to train them in their safe handling. The expansion of the company's business at this location to include the temporary storage of a number of hazardous wastes, therefore, has had a solid foundation upon which to build the additional training needed for the handling of hazardous wastes.

The approximately 70 branches of VW&R are divided into three Regions, headquartered in Oak Brook, Illinois, Spartanburg, South Carolina, and Santa Fe Springs, California. Each Region in turn, is divided into Areas, which are composed of a number of service centers.

The organizational structure of a typical Chemical center is headed by a Manager, who is assisted by a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Area Office as well as the Regional Office, who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee; he/she is assured a formal teaching exposure which is then documented in his/her record.

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The manager of the Center and the Administration Manager play a part in compliance with RCRA regulations, but typically are not involved in the actual supervision of handling the wastes. That responsibility lies chiefly with the Operations Manager, who manages the handling and maintenance of waste materials while they are in storage. This position carries the responsibility of assuring that the routine inspections and physical handling procedures are adhered to. The Administrative Manager is involved with such paperwork such as that related to in-and-out shipments, inventory control, and maintenance of records involving hazardous wastes.

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by Center Management and the Area RCRA Training Director on all facets of hazardous waste management. Responsibilities for hazardous waste management are not delegated until such training is completed.

The duties, responsibilities, and qualifications for these three management positions follow.

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Position: Administration Manager

Responsibilities and Duties:

- Supervises general office activities, including proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
- Notifies Center Manager of emergency situations and may act as an alternate Emergency Coordinator in his or the Operation Manager's absence.
- Assures that necessary reports, records, notifications, etc., are prepared to comply with RCRA, as well as all other government regulations. This includes routine activities as well as non-routine occurrences, such as implementation of the facility Contingency Plan.
- Reports to the Center Manager.

Experience and Qualifications:

- High School graduate
- 1-2 years in office related work with supervision experience desirable.

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Position: Manager, Service Center

Responsibilities and Duties:

- Has overall responsibility for selection of personnel and supervision of training programs, including proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan Implementation, etc. The actual conducting of training in these areas may be delegated to other supervisory personnel, although the responsibility to assure its adequate completion remains the Manager's.
- Supervises and oversees facility's ongoing safety program, which includes the assurance of the conducting of monthly safety meetings.
- Works in conjunction with Regional Office personnel in assuring the proper attainment of permits and licenses from local, state, and federal agencies.
- Supervises branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customer's wishing to utilize the Company's waste handling capabilities. Assures that customers and branch have appropriate permits and that all necessary and required data as set forth in the regulations and Company procedures are adhered to and

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present at the location for proper management of materials.

- Addresses, and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contingency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High school graduate - college desirable .
- 3-5 years sales or sales management experience with supervisory responsibilities.

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Position: Operations Manager

Responsibilities and Duties:

- Is usually the facility's Emergency Coordinator.
- Supervises overall operation and maintenance of the physical aspects of the facility in compliance with all applicable government regulations and Company operating procedures.
- Maintains facility compliance with RCRA and other governmental agency regulations specific to waste management practices.
- Maintains operational logs, maintenance records, inspection records, and conducts monthly safety meetings with branch operations personnel.
- Supervises loading/unloading of all materials (include wastes), placement of material, and required paperwork as required by Company procedures.
- Is involved in the training and indoctrination of new personnel at the service center.
- Notifies Center Manager of emergency situations.
- Schedules all maintenance and repair equipment and facility structure of both a routine and non-routine nature.
- Oversees the drivers' activities to assure compliance with all appropriate procedures for transporting of materials, accepting waste materials, response to emergency situations, and equipment maintenance.

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- Monitors and approves the findings of waste container and emergency equipment inspections, and implements any necessary remedial activities if inspection reports warrant.
- Reports to the Center Manager.

Experience and Qualifications:

- High School graduate.
- 1-2 years of experience or training in transportation, handling of hazardous materials, and warehouse activities. Supervisory experience desirable.

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(INSTRUCTIONS ON PAGE FOUR)

INCUMBENT	A.		
	TITLE Warehouseman		NAME
	CORPORATE STAFF/COMPANY VW&R		DIVISION
	DEPARTMENT	LOCATION "Your Branch"	DATE
	B. GENERAL STATEMENT OF POSITION FUNCTION		
	VW&R warehouseman is responsible to the Branch Operations Manager/Branch Manager for the safe, efficient performance of the functions assigned him. In order to carry out these responsibilities he must have completed the required written and driving tests and be qualified to operate a forklift truck. Upon completion of indoctrination and training he will perform his work in strict accordance with all safety, storage, and handling practices as required under O.S.H.A., the National Fire Protection Agency, the Environmental Protection Agency, the Food and Drug Administration, the Department of Transportation, and Company policy. All functions of loading, unloading, stacking, palletizing, storage and movements of material are to comply with Company standards. He will maintain cordial relationships with both internal and external sources in the best interest of the Company and perform his work to protect the public, his fellow workers, and the environment.		
	C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position - if used as personnel requisition)		
MANAGER		DATE	
PERSONNEL DEPARTMENT		DATE	
ORGANIZATION AND MANAGEMENT PLANNING (GRADE 15 AND ABOVE)		DATE	
COMPENSATION (To be completed by Personnel Department)			
GRADE LEVEL		DATE	
BY		DEC 22 1986	
TITLE			

D. POSITION SCOPE

REPORTS TO	NAME "Supervisor"	TITLE "
SUPERVISES DIRECTLY	TITLE	NO. OF EMPLOYEES
	TITLE	NO. OF EMPLOYEES
	TITLE	NO. OF EMPLOYEES
SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES)		EXEMPT 0 NON-EXEMPT 0
FINANCIAL		
SALES/BUDGETS/PROFITS \$		ASSETS \$
RELATIONSHIPS		
INTERNAL		EXTERNAL
Branch Manager		Customer
Administrative - Operations Manager		Other Branch's Employees
Truck Drivers		

E. POSITION SPECIFICATIONS (Qualifications for job)

EDUCATION/ KNOWLEDGE	Min. -- High School graduate or equivalent
EXPERIENCE	Min. -- 18 years of age. -- 6 months experience operating forklift.
SKILLS	--Capable of operating assigned forklift. --Successful completion of forklift written and skills exam. --Successful completion of lifting exam. --Successful completion of matching exam. --Complete training requirements of EPA regulations regarding loading/unloading, storing, and shipment of hazardous wastes. --Knowledgeable of D.O.T. regulations regarding loading, bracing, shipping, etc.

F. MAJOR RESPONSIBILITIES	WEIGHT (Importance)	STANDARDS OF PERFORMANCE (How responsibilities are measured)
Warehousing	40-50%	<p>--Responsible for all safety guidelines as outlined by Company policy and training (i.e. use of safety equipment, proper modes of operation and procedures, equipment inspections-- maintenance, etc.)</p> <p>--Full compliance with all DOT/EPA regulations as outlined in training sessions. All incidents of a nature requiring management attention are to be immediately reported to management for thorough investigation and necessary action.</p> <p>--Compatible storage of all materials at facility as dictated by Company standards and regulatory agencies.</p> <p>--Compliance with requirements for proper storage and monitoring of waste materials as outlined in EPA 40 CFR.</p>
Loading/Shipping/Receiving	30-40%	<p>--Full compliance with DOT/EPA (governing waste and "virgin" material movements) and Company procedures for loading, bracing, offering appropriate placards, reviewing shipping papers (including manifests), handling internal paperwork, etc.; to effect legal and efficient movements of material.</p>
Maintenance	5-10%	<p>--Adherence to forklift and other warehouse equipment P.M. programs as outlined by management.</p> <p>--Housekeeping within the branch facility to meet Company standards to protect the branch's assets from deterioration other than that of normal wear and tear.</p>
	100 %	

(INSTRUCTIONS ON PAGE FOUR)

	A.		
	TITLE Truck Driver		NAME
	CORPORATE STAFF/COMPANY VW&R		DIVISION
	DEPARTMENT	LOCATION "Branch"	DATE
INCUMBENT	B. GENERAL STATEMENT OF POSITION FUNCTION		
	A VW&R driver is responsible to the Branch Operations Manager/Branch		
	Manager for the safe, efficient, and legal operation of his vehicle and the		
	transporting of materials to/from customers and suppliers. In carrying out these		
	responsibilities, he is required to operate and maintain his/her vehicle and		
	transport such goods in full compliance with all applicable Federal, State, and		
	Local regulations, as well as within Company policy. Each driver is required		
	to meet all the requirements of Part 391 of Title 49 D.O.T. regulations "Quali-		
	fications of Drivers", prior to and during his/her employment with VW&R		
	VW&R Upon completion of indoctrination and introductory training		
he will perform his work in strict accordance with the requirements of Department			
of Transportation (Title 49) and Environmental Protection Agency (Title 40)			
regulations, and Company policy. He will maintain cordial relationships with			
both internal and external sources in the best interest of the Company and			
perform his work to protect the public and environment.			
C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position - if used as personnel requisition)			
MANAGER		DATE	
PERSONNEL DEPARTMENT		DATE	
ORGANIZATION AND MANAGEMENT PLANNING (GRADE 13 AND ABOVE)		DATE	
COMPENSATION (To be completed by Personnel Department)			
GRADE LEVEL	DATE	BY	

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TITLE

D. POSITION SCOPE

REPORTS TO	NAME : "Supervisor"	TITLE "	"
SUPERVISES DIRECTLY	TITLE	NO. OF EMPLOYEES	
	TITLE	NO. OF EMPLOYEES	
	TITLE	NO. OF EMPLOYEES	
SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES)		EXEMPT 0	NON-EXEMPT 0

FINANCIAL

SALES/BUDGETS/PROFITS \$

ASSETS \$

RELATIONSHIPS

INTERNAL	EXTERNAL
Branch Manager	Customers
Administrative - Operations Manager	Other Branch's Employees
Warehousemen	

E. POSITION SPECIFICATIONS (Qualifications for job)

EDUCATION/ KNOWLEDGE	Min. -- High school graduate or equivalent
EXPERIENCE	Min. -- Minimum 25 years of age. -- Recent graduate from truck driving school with no experience.
SKILLS	--Capable of operating assigned vehicle. --Successful completion of required D.O.T. Drivers Road Test. --Knowledgeable of all applicable D.O.T. regulations. --Complete training requirements of EPA regulations regarding loading, transporting and unloading of hazardous wastes.

F. MAJOR RESPONSIBILITIES	WEIGHT (Importance)	STANDARDS OF PERFORMANCE (How responsibilities are measured)
Driving	80-90%	<p>--Deliveries and pick-ups made on a timely basis.</p> <p>--Logs will be received the following morning with no deviations from regulations, and in a neat manner.</p> <p>--Adherence to tachograph program and the standards of performance expected under that program.</p> <p>--Responsible for all safety guidelines as outlined by Company policy and training (use of safety equipment, proper modes of operation and procedure equipment inspections = maintenance, etc.)</p> <p>--Full compliance with all D.O.T./E.P.A. regulations as outlined in training sessions. All incidents of a nature requiring management attention to be immediately reported to management for thorough investigation and necessary action.</p> <p>In addition to H/M and H/W regulatory adherence; full compliance with all traffic laws, speed limits, weight limits, placarding requirements, etc., in effect.</p>
Maintenance and Delivery	10-20%	<p>--Truck will be kept in neat, safe, and orderly manner. Inspections to be made daily on vehicle; maintenance schedule adhered to as outlined by management.</p> <p>--Render any necessary assistance at customer or branch location to warehousemen, to prepare for loading or delivery (i.e. assisting w/unloading, cleaning trailers, checking count, etc.)</p>
	100 %	

The Manager of this facility is responsible for supervision and review of appropriate training of new personnel.

Incorporated into the employee's training program is indoctrination to ensure that the personnel will be knowledgeable in not only their routine job functions, but also in how to respond properly to emergency situations. Training shall include review of the Contingency Plan as well as specific discussion on the following:

- Proper utilization, location, inspection, repairing, and replacing of facility safety and emergency equipment.
- The designated alarm signals which shall be used to set in motion the evacuation of the facility, as well as the location of the designated congregation point for the accounting of facility personnel as included in the Contingency Plan.
- Proper response to a facility fire or explosion which might necessitate facility implementation of the Contingency Plan.
- Proper response and remedial action upon the discovery of a spill which could result in ground water contamination, including the containment, control, and effect of the material as outlined in the Contingency Plan.
- Job assignments of facility personnel in an emergency situation and how safe and orderly evacuation of the facility is to be accomplished in a shutdown situation.

This facility does not have present any processes which might necessitate the training of employees in automatic waste feed cutoff procedures.

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The training of the other branch personnel involved in the handling of hazardous wastes - the warehousemen - is the responsibility of the local management, usually the local Operations Manager who had received his hazardous waste-related training from the Area Training Director, who will have directed the initial training program at this branch. In his regular capacity as Area Operations Manager, the Training Director, will be aware of and assured that the technical competency of the local Operations Manager is adequate.

Outlines of the training programs for (1) the branch management and (2) the warehousemen and drivers follow:

Two particular aspects of training should be mentioned. One, the outline entitled "Hazardous Waste Pick-up Checklist", has been referred to as a means of training VW&R drivers what to look for - i.e., what standards to insist upon - when picking up drums of waste at a customer's location. A copy follows.

As the VW&R facility embarks upon the accumulation of drums of hazardous wastes destined for incineration, a specific effort will be required to acquaint facility management of the problems involved and how proper identification and segregation procedures of incoming drums are to be implemented.

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Training sessions conducted with center management personnel typically involve a full day's session of classroom instruction. The topics reviewed at these sessions are designed to give a broad overview of the intent of the regulations, as well as explaining and training the employees in specific company procedures which had been developed for facilities to follow in order to comply with the requirements set forth in the regulations. Review is provided to the employees as permitting approaches of their particular facility for specific types of wastes and Area. Frequent updates and advisories are forwarded from the Regional and Area offices to keep employees current on hazardous waste regulations which might impact their facility's operations.

VW&R has developed the appended training outline for warehousemen and truck drivers. Copies of this training outline are on file at the facility for use in the training or review of the actual employees filling these positions. Background and educational requirements for these "hands-on" positions are spelled out in the Position Guides (job descriptions and qualifications) for warehousemen and truck drivers that follow the training program outlines.

The employee training program includes sections providing instruction and indoctrination in all areas appropriate for the individual's job responsibilities. Specific sections are included in these guides which address the use, repair, inspection and monitoring of safety equipment which may require utilization in routine job functions, as well as

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in emergency situations. Maintenance of facility equipment is also covered in these outlines. Emergency and Contingency Plans are reviewed, as are all necessary operating procedures in order to comply with Company and regulatory standards.

Center management personnel are trained in similar areas of VW&R business depending upon their area of responsibility. The training of such personnel is supplemented by staff training sessions at the facility, Company-conducted seminars, or visits to another Company location in order to work with experienced personnel holding a similar job position.

New employees filling a position at the facility and who will be involved in hazardous waste management and/or handling activities will be trained in all necessary facets of hazardous waste management as outlined in 40 CFR 264.14 within six months after their employment or assignment to the facility. Employees not fully trained in all appropriate sections pertaining to hazardous waste management shall not be allowed to work unsupervised until such training is completed.

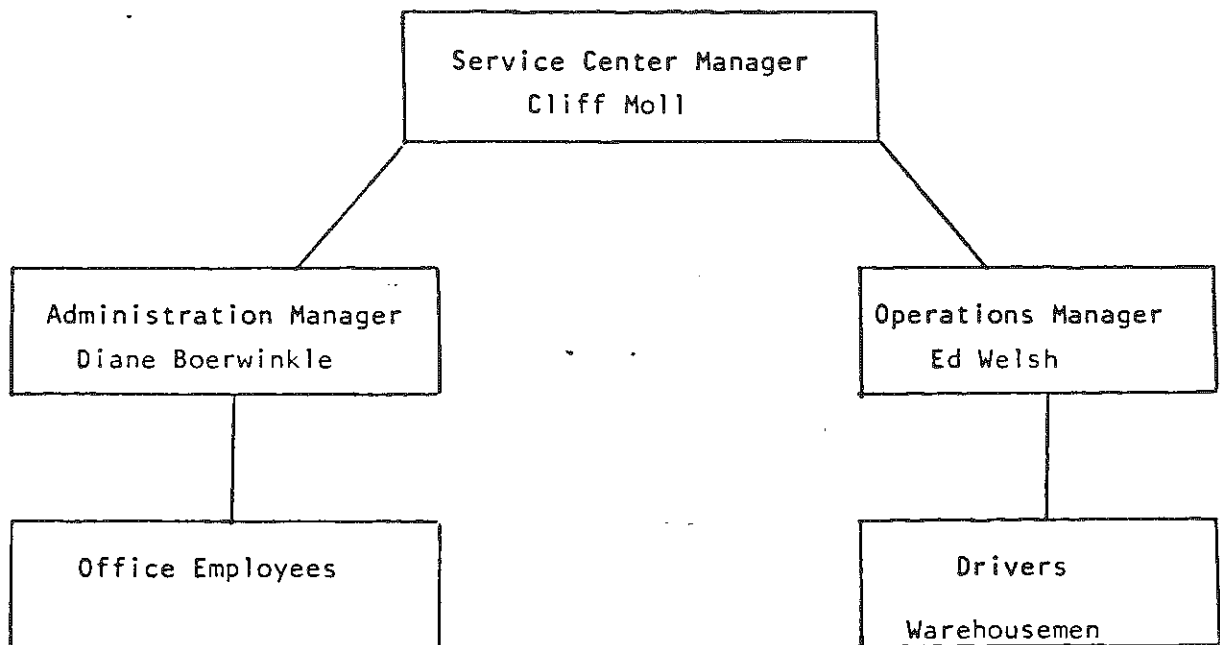
VW&R policy requires monthly safety meetings at all facilities. Topics discussed typically include appropriate use of safety equipment, safe material handling and transport, emergency procedures, and housekeeping. Emergency drills are conducted at least every six months to reinforce job assignments and procedures. Annual hazardous waste handling review sessions are conducted as required under the regulation.

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Personnel Training

The management personnel at this VW&R facility are organized as follows:



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All management personnel have attended, or will attend, a VW&R hazardous waste training session as described, supervised by Mark S. Kirkland, the Regional Operations and Safety Manager.

As Regional Operations and Safety Manager, Mr. Kirkland is responsible for every aspect of safety related to VW&R warehousing, transporting, repacking, and bulk handling of VW&R extensive array of hazardous chemicals and solvents. This included the drawing up of formal safety programs (training, safety meetings, direct mailing of safety literature, quarterly safety audits of each branch, analysis of each accident or near-accident with subsequent dissemination of details to the branches, accident investigations, applications of disciplinary acts) as well as responsibility for purchasing, maintenance and training in the use of all transport equipment, warehouse and repacking machinery, specifying and purchasing containers and storage vessels used by the branch, as well as the repair and maintenance of the warehouse, yard, and repacking installation of each branch. The Regional Regulatory Compliance Supervisor reports to him. It is only a short, logical step from these comprehensive responsibilities involving hazardous materials to the responsibilities required for the safe handling of hazardous wastes, which are essentially a "used" version of the materials routinely handled by each VW&R facility.

The overall training programs receive input from the Technical Director, Legal Department, Finance and Insurance support groups in the Corporation's Home Office.

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Records herein outlined shall be maintained at the facility location. These records shall be kept until closure of the facility for current employees, and for a minimum of three (3) years from the date of an individual employee's separation from the Company.

Job descriptions are filed at the Branch Manager's Office.

VW&R has developed the following training outline for those branch personnel involved with hazardous waste - branch management as described previously, warehousemen, and truck drivers.

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Training Program Outline

A. Branch Management

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The Contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator.
5. Recordkeeping, the Operating Record, Inventory Control.
6. Inspections- Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.
11. Ignitables, Incompatibles.

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Personnel Training

B. Warehousemen

1. Orientation with Company Structure
2. Safety Considerations, Safety Equipment Use and Maintenance,
Locations of Equipment.
3. Warehouse Equipment, Forklifts, Pallets, Drum Grabbers, Dock
Plates.
4. Paperwork, Hazardous Waste Manifests, Receiving Trickets.
5. Emergency Response, Contingency Plan, Evacuation Plans.
6. Housekeeping. . .
7. Drum Handling, Drum Storing Techniques.
8. Hazardous Waste Responsibilities, Manifests.

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HAZARDOUS WASTE PICK-UP CHECKLIST

I. Manifest

	<u>YES</u>	<u>NO</u>
1) Manifest Document Number	—	—
2) Generator Name, Address, Phone Number	—	—
3) Federal EPA Identification Number (Small Generator Exemption)	—	—
4) VW&R Listed As Transporter (Showing VW&R Branch EPA Identification No.) IF MATERIAL IS BEING TAKEN BACK TO VW&R LOCATION THEN:	—	—
5) (a) VW&R Listed as Designated T.S.D.F. (Showing VW&R Branch EPA Identification No.) IF MATERIAL IS BEING TAKEN DIRECTLY TO ANOTHER T.S.D.F. THEN:	—	—
5) (b) T.S.D.F. Name, Address, Phone, and EPA Identification Number	—	—
6) Federal EPA Waste Code Number	—	—
7) Proper Shipping Name NOTE: IF MATERIAL IS SHOWN AS A N.O.S. SHIPPING NAME (I.e. WASTE FLAMMABLE LIQUID N.O.S.) THEN IT MUST BE FOLLOWED BY A DESCRIPTION OF THOSE CONSTITUENTS WHICH COMPRISE THE HAZARD (I.e. WASTE FLAMMABLE LIQUID N.O.S. - ACETONE/TOLUOL MIXTURE)	—	—
8) Total Quantity of Waste by Weight	—	—
9) Number and Type of Containers	—	—
10) Required Certification Statement on Manifest	—	—
11) Generator's Signature	—	—

ADDITIONAL STATE REQUIREMENTS

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HAZARDOUS WASTE PICK-UP CHECKLIST

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II. Packaging

YES

NO

- | | | |
|--|-------|-------|
| 1) Container is sealed with no apparent leaks. | _____ | _____ |
| 2) Proper DOT shipping name on container. | _____ | _____ |
| 3) 'WASTE' precedes proper DOT shipping name. | _____ | _____ |
| 4) Generator's name and address on container. | _____ | _____ |
| 5) Manifest number on container. | _____ | _____ |
| 6) Applicable DOT Hazardous Warning Label. | _____ | _____ |
| 7) Date accumulation began. | _____ | _____ |

ADDITIONAL STATE REQUIREMENTS

TRAINING GUIDE AND DOCUMENTATION
WAREHOUSEMEN

Employee Name _____

Instructor(s) _____

Date Hired _____

☐ Original Training

☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquired

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits.
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job
- (Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to receive an emergency call regarding an off-site incident.
3. Review of Material Safety Data Sheets--information contained on form, location, etc.
4. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.
2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:

- a) Rubber Suits
- b) Rubber Boots
- c) Rubber Gauntlet Gloves
- d) Canvas Gloves
- e) Chemical Goggles
- f) Face Shields
- g) Hard Hats
- h) Fire Extinguishers (different types, sizes, locations, inspections, etc.) (Ch. Op. Ref. 80.01)
- i) First Aid Kits
- j) Neutralizer (limitations, locations)
- k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

- l) Recovery Drums (review the need for labeling, marking)
- m) Chlorine Kit
- n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.
- o) Hazorb, absorbents
- p) Other articles at location

3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80)
Review those appropriate to location:

- a) Self-contained units (Air Packs)
- b) Canister type respirators -- review various canisters, shelf life of canisters, etc.
- c) Gas masks
- d) Dust Masks
- e) Other

4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Utilization and Maintenance of Warehouse Equipment

A. Review various warehouse equipment which is present at location. Discussion should be included on selection, use, load limitations, and maintenance of all items. A partial listing would include but not be limited to the following:

1. Sweeper
2. Scrubber

NOTE: Regarding the above items, if battery powered units are present, demonstration should be given on how to properly connect unit to charger, along with routine maintenance procedures such as filter checks, brush replacement, cleaning, cleaner usage, etc.

3. Lift-O-Matic
4. Pallets - different sizes and uses. Do not allow overhang if possible. Discuss maintenance and out of service conditions for pallets. Review the dedication of pallets for USP and Poison material.
5. Pallet Pullers
6. Pallet Trucks
7. Dock Plates, Levelers, Bumpers, Seals
8. Pallet Racks - discuss the importance of compatibility of materials in racks, load limits (typically 6000#/shelf), maintaining of heavier load low, use of good quality pallets and appropriately sized, keeping of liquid items from being stored above dry materials to guard against ruining of dry materials in the event of leaks.
9. Wheel chocks (truck and rail)
10. Trailer jacks
11. Derails and warning signs
12. Car movers
13. Rail car door pullers
14. Trailer straps, load bars, blocking and bracing materials.

(Continued)

15. Drum trucks and Hand trucks
 16. Air compressors
 17. Boilers
 18. Heaters
 19. Sprinklers
 20. Banders
 21. Stretch Wrap
 22. Others as appropriate to location
-
-
-
-

IV. Forklifts

A. Certification

1. Written Exam - administered and reviewed
2. Skill Demonstration Exam - administered and reviewed.

NOTE: Upon satisfactory completion and review of the above items, the trainee is to be issued an operators card.

B. Review of branch forklift(s) load capacities.

C. Care and Maintenance

1. Daily inspection sheets - review of how to prepare and demonstration of conducting a proper inspection.
2. Review of proper start-up and shut-down procedures. Fuel shut-off, removal of keys, forks at floor, etc.
3. Fuel storage and control requirements. Demonstration of the proper means of changing tanks.
4. Preventative Maintenance - frequency, responsibility.

V. Paperwork

(Continued)

A. Forms - review the various forms which the trainee may be exposed to in his/her daily job functions. Discuss the appropriate use, review, preparation of forms. The forms reviewed may include but not be limited to:

1. Bill of Lading
 - a) VW&R prepared
 - b) Outside carrier, supplier
2. Purchase Orders
3. Receiving Tickets
4. Pick up notices
5. Hazardous Waste manifests
6. Empty Container Receipts
7. C.O.D. procedures
8. Material Scrap Reports
9. Fuel tickets
10. Empty Container Scrap Reports
11. Job Tickets and Supplemental Job Tally cards.
12. Product meter tickets
13. Scale Tickets
14. Others as appropriate

Note: It is unlikely that the trainee will be totally familiar with the preparation and routing of the forms immediately after training. Continued follow-up and review is required to allow the trainee to become self-sufficient.

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- B. Discuss the necessity for review of paperwork to assure that errors are not allowed to go unnoticed. The importance of continual double-checks should be stressed.

VI. Material Handling - Warehouse and Loading

- A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.)
- B. Review of hazardous materials - identification by DOT labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (Ch. Op. Ref. 10.70 and 30.55, Exhibit I).
- C. Review of DOT loading restrictions on trailers (Ref.- Wall Loading Charts. See also Section VII, "Compatibility...")
- D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.
- E. First-In/First-Out inventory usage and maintenance.
- F. Proper action to be implemented in the event of package damage. Immediate use of:
 - 1. Tape
 - 2. Overbags
 - 3. Salvage drums
 - 4. Container transfer by appropriate personnel if branched approved.
- G. Disposition of damaged materials (dumpster off limits unless authorized)
- H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch. Op. Ref. 40.10).
- I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility...")
- J. Detention and demurrage
- K. Cleaning of trailers and railcars.
- L. Weight distribution on trucks/trailers.

(Continued)

- M. Required loading and bracing techniques on trucks/trailers.
- N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarily limited to include:

Bags

- 1. Crosstie 24 x 100# bags on 48" x 48" pallets.
- 2. Crosstie 21 x 100# bags on 42" x 48" pallets.
- 3. Short 100# bags can be palletized six across and five high (30 bags).
- 4. 50# bags -- 40 per pallet.

Drums

- 1. Drum size to dictate number contained on pallet - no overhang should be present.
- 2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

- 1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.
- 2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

(Continued)

3. Ton containers must be properly braced/chocked when in transit. In storage they should be placed on 4 x 4's (or similar method to raise them off ground) and chocked to prevent rolling.

O. Hazardous Waste - discussion of designated storage area and secondary containment system.

P. Review of proper lifting techniques.

VII. Compatibility and Storage Techniques (Ch. Op. Ref. 40.01)

A. Review of designated warehouse/yard storage areas for materials of given hazardous nature.

B. Maintaining of clear, clean, and marked aisleways.

C. Company Compatibility Program and branch binder -- review of binder location and its use.

D. Storage of drummed Flammable Liquids in quantities per OSHA standards (40 drum limit - 2200 gallons per group).

E. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).

F. Hazardous Waste designated storage area and the compatibility requirements of materials stored within area.

G. Available reference materials.

1. MSDS's

2. Dow Stewardship (Ch. Op. Ref. 10.65).

3. Suppliers

4. Company Staff Personnel

VIII. Hazardous Waste Handling Procedures (As required under 40 CFR, Section 265.16) Required areas of training are the following:

A. VW&R general safety - covered under Section II, "Safety".

B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.

1. Review of incoming shipments

- a) Count verification

- b) Proper labels

(Continued)

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- c) Proper containers
- d) Proper data filled in on manifest forms.

2. Preparation of reshipments

- a) Count verification
- b) VW&R "add-on" labels to indicate manifest number, lot number, etc.

- C. Emergency/Contingency Plan - covered under Section II, "Safety".
- D. Container Receiving and Maintenance Procedures.
- E. Weekly Container Inspection - review of inspection form and logging requirements.
- F. Container Transfer Procedures in event of a "leaker" - review documentation requirements.
- G. Emergency Response procedures to be reviewed as it pertains to Hazardous Waste incidents.
- H. Evacuation Plan - covered under Section II, "Safety".
- I. Forklift Certification - covered under Section IV, "Forklifts".
- J. Compatibility - covered under Section VII, "Compatibility..."
- K. Emergency Equipment - covered under Section II, "Safety".
- L. Review the need for management to make the determination as to whether a virgin material which may have to be scrapped must be handled as a hazardous waste, and the proper means of accomplishing such.

NOTE: It is required that the individual be given an annual review of their training as it applies to H/W procedures - and be documented.

IX. Housekeeping, Sanitation, and General Facility Maintenance (Ch. Op. Ref. 10.72 and 40.60)

- A. Accountability of the employee for assigned work area. Responsibility for tools, equipment, cleanliness, safety, etc.
- B. Clean up of work areas. Stress the importance of immediate clean up.

(Continued)

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- C. Importance of nonobstruction of aiseways, stairs, ramps, and walkways.
- D. Dumpster location, nightly waste receptacle emptying.
- E. Good Manufacturing Practices (Ref. 40.62).
- F. Snow conditions. Necessity for shoveling and salting/sanding of work and pedestrian travel areas.
- G. Replacement of light bulbs means of access in warehouse area.
- H. Rodents, birds, and insects. Means of control and reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.

TRAINING GUIDE AND DOCUMENTATION
TRUCK DRIVER

Employee Name _____

Instructor(s) _____

Date Hired _____

☐ Original Training

☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquired.

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits. (Ch. Op. Ref. 10.90)
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job
- (Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to become involved in an emergency regarding an off-site incident (Ch. Op. Ref. 10.20 page 5).
3. Review of Material Safety Data Sheets--information contained on form, location, etc.
4. Proper handling of hazardous chemicals (Ch.Op.Ref. 10.70).
5. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.
2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:
 - a) Rubber Suits
 - b) Rubber Boots
 - c) Rubber Gauntlet Gloves
 - d) Canvas Gloves
 - e) Chemical Goggles
 - f) Face Shields
 - g) Hard Hats
 - h) Fire Extinguishers (different types, sizes, locations, inspections, etc.)(Ch.Op.Ref. 80.01)
 - i) First Aid Kits
 - j) Neutralizer (limitations, locations)
 - k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

- l) Recovery Drums (review the need for labeling, marking)
- m) Chlorine Kit
- n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.
- o) Hazorb, absorbents
- p) Other articles at location

3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80)
Review those appropriate to location:

- a) Self-contained units (Air Packs)
- b) Canister type respirators -- review various canisters, shelf life of canisters, etc.
- c) Gas masks
- d) Dust Masks
- e) Other

4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Requirements of Truck Drivers

A. Company requirements

1. Successful completion of all governmental requirements for licensed operation of assigned vehicle.
2. Traffic and driving knowledge test.
3. Physical lifting test.
4. Reading and matching ability test.
5. 25 years of age.
6. Annual defensive driving course.
7. Annual checkride by supervisor.
8. Compliance with Company work rules.
9. Working knowledge of paperwork, pick-up notices, empty container receipts, C.O.D. procedures, etc.

B. Governmental requirements

1. Required compliance with all Federal, State, and local regulations.
 - a) D.O.T. Hazardous Materials Regulations
 - (1) Qualifications file/documents on person.
 - (2) Knowledge of Hazardous Materials Regulations.
 - (3) Documents, bill of lading, accessibility.
 - (4) Recordkeeping, driver's daily logs, driver's daily reports, driver's inspection reports, maintenance files -- availability for inspection/retention time.
 - (5) Accident reporting, MCS-50T, Hazardous Materials Incident Report, immediate notification requirements.
 - b) EPA
 - (1) Knowledge of EPA regulations
 - c) O.S.H.A., F.D.A., etc.

(Continued)

IV. Requirements of Equipment

A. Company requirements

1. Equipment must be in full compliance with all governmental requirements.
2. Efficient and proper use of equipment.
3. Proper inspection, preventative maintenance, and repair of equipment/authorization for repairs.
4. Tachographs and hubdometers are used to track vehicle operation and supplement maintenance recordkeeping.
5. Special operating procedures, winter starting, fuel considerations (Ch.Op.Ref. 30.75).
6. Gelco maintenance procedure.
7. Vehicle appearance.
8. Vehicle security (Ch.Op.Ref. 60.01).

B. Governmental requirements

1. Required compliance with all Federal, State, and local regulations.
2. Proper vehicle registration as required.
 - a) D.O.T. regulations.
 - (1) Compliance with equipment inspection, maintenance, and maintenance recordkeeping requirements.
 - (2) Compliance with "Out of Service" criteria.
 - (3) Operation of equipment in safe and proper manner.

V. Material Handling - Warehouse/Loading/Unloading

- A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.).
 - B. Review of hazardous materials - identification by D.O.T. labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (ch. Op. Ref. 10.70 and 30.55, Exhibit I).
 - C. Review of D.O.T. loading restrictions on trailers (Ref. Wall Loading Charts. See also Section VII, "Compatibility..."). Review requirements of hazardous material accessibility.
- (Continued)

- D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.
- E. Review wheel chocking requirement on trucks and trailers. Dropped trailers should also have trailer jacks under frame at nose.
- F. Proper action to be implemented in the event of package damage. Immediate use of:
 - 1. Tape
 - 2. Overbags
 - 3. Salvage Drums
 - 4. Container transfer by appropriate personnel if branched approved.
- G. Disposition of damaged materials (dumpster off limits unless authorized).
- H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch.Op. Ref. 40.10).
- I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility ...")
- J. Detention and demurrage.
- K. Cleaning of trailers and railcars.
- L. Weight distribution on trucks/trailers.
- M. Required loading and bracing techniques on trucks/trailers.
- N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarily limited to include:

Bags

- 1. Crosstie 24 x 100# bags on 48" x 48" pallets.
- 2. Crosstie 21 x 100# bags on 42" x 48" pallets.
- 3. Short 100# bags can be palletized six across and five high (30 bags).
- 4. 50# bags -- 40 per pallet.

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Drums

1. Drum size to dictate number contained on pallet- no overhang should be present.
2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.
2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

VI. Material Handling - Bulk Loading/Unloading

- A. General review of types of bulk delivery equipment handled at facility.
- B. Review of proper operating procedures for bulk delivery equipment assigned.
- C. Review of emergency procedures for bulk delivery equipment assigned.
- D. Review of D.O.T. requirements concerning attendance, certification, and retest requirements.
- E. Review of Company procedures concerning repackaging/ sampling/label order procedure (Ch.Op.Ref. 20.10, 20.20, 20.30).
- F. Review of Small Bulk "Customer Tank Inspection/ Approval" form and its proper usage.

(Continued)

- G. Loading and bracing requirements for portable tanks.
 - H. Marking, placarding, UN and NA four digit numbers on portable tanks and cargo tanks.
 - I. Review of requirements as they apply to empty portable tanks/cargo tanks with residue.
- VII. Compatibility Program (Ch. Op. Ref. 40.01)
- A. Company Compatibility Program and branch binder -- review of binder location and its use.
 - B. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).
 - C. Available reference materials.
 - 1. MSDS's.
 - 2. Dow Stewardship (Ch. Op. Ref. 10.65).
 - 3. Suppliers.
 - 4. Company Staff Personnel.
- VIII. Hazardous Waste Handling Procedures (As required under 40 CFR, Section 265.16) Required areas of training are the following:
- A. VW&R general safety - covered under Section II, "Safety".
 - B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.
 - 1. Review of incoming shipments (See hazardous waste pick up checklist).
 - a) Count verification.
 - b) Proper labels.
 - c) Proper containers.
 - d) Proper data filled in on manifest forms.
 - 2. Preparation of reshipments.
 - a) Count verification.
 - b) VW&R "add-on" labels to indicate manifest number, lot number, etc.
 - C. Emergency/Contingency Plan - covered under Section II, "Safety".

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- D. Container Receiving and Maintenance Procedures.
- E. Container Transfer Procedures in event of a "leaker"
- review documentation requirements.
- F. Emergency Response procedures to be reviewed as it
pertains to Hazardous Waste incidents.
- G. Evacuation Plan - covered under Section II, "Safety".
- H. Compatibility - covered under Section VII, "Compati-
bility..."
- I. Emergency Equipment - covered under Section II, "Safety".
- J. Review the need for management to make the determination
as to whether a virgin material which may have to be
scrapped must be handled as a hazardous waste, and the
proper means of accomplishing such.

NOTE: It is required that the individual be given an
annual review of their training as it applies
to H/W procedures - and be documented.

- IX. Housekeeping, Sanitation, and General Facility Maintenance
(Ch. Op. Ref. 10.72 and 40.60).
 - A. Accountability of the employee for assigned work area.
Responsibility for tools, equipment, cleanliness, safety,
etc.
 - B. Clean up of work areas. Stress the importance of
immediate clean up.
 - C. Importance of nonobstruction of aisleways, stairs,
ramps, and walkways.
 - D. Dumpster location, nightly waste receptacle emptying.
 - E. Good Manufacturing Practices (Ref. 40.62).
 - F. Snow conditions. Necessity for shoveling and salting/
sanding of work and pedestrian travel areas.
 - G. Replacement of light bulbs means of access in warehouse
area.
 - H. Rodents, birds, and insects. Means of control and
reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.

Van Waters & Rogers Inc.

Closure and Post-Closure Plans

(40 CFR Sec. 122.25(a)(13), 264.111 - 264.120, 264.78, 264.197
264.258, 122.25(a)(14), 122.25(a)(15), 264.142)

This section outlines the steps which the subject VW&R storage facility will follow in a closure situation in order to comply with applicable sections as outlined in the Resource Conservation and Recovery Act.

Because this facility functions as only an accumulation and transfer point for containerized spent solvents destined for recycling

partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this activity is the sole reason for VW&R being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility. For this reason, partial closure will not be addressed.

It should be further noted that because of the nature of the activity at this facility, that accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility, a post-closure plan will not be required because materials are being continually removed from this facility; in a closure situation, all materials would be removed in a similar fashion as practiced in routine day-to-day business.

VW&R will maintain a copy of this closure plan at the facility. The Company is aware that should this facility contemplate

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closure of the site, the EPA, Regional Administrator, and the comparable state agency must be notified at least 180 days prior to the date that the Company closes the facility.

VW&R will continue to operate business at this facility as long as it is deemed economically viable by the Company, and so long as its operation is otherwise permitted by applicable law. The Company is thus, at this time, unable to specify anticipated date of closure.

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both VW&R and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved closure plan.

Procedures developed by VW&R for managing waste materials are designed to ensure the facility's compliance with applicable laws, and to eliminate any necessity for further maintenance or control to prevent threats to human health or the environment. As outlined in the section entitled "Secondary Containment System Design and Operation", any evidence of unintentional leakage and subsequent containment will be sampled and analyzed to determine the specific contaminant and degree of clean up necessary. All contaminated materials will be removed and disposed of at a permitted disposal facility. The containment area shall be regraded to the original design in the event of surface material removal. The container(s) which indicate release of material shall be found, segregated, and handled in the proper manner to alleviate further release of material in accordance with Company procedures. The incident shall be reported and documented as appropriate based upon severity

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and circumstances.

Due to the nature of VW&R involvement in hazardous waste management, it becomes extremely difficult to be specific on the maximum quantities and types of material which would be on hand in a closure situation.

Factors such as economic conditions, seasonal trends, and market growth will impact a particular generator's rate of use of materials, and thus affect the amount of materials shipped to this location for temporary storage and eventual recycling.

In no case, will this facility store more than 110 55 gallon drums at any one time. In the majority of cases, the maximum number of containers held at any one time will be below this quantity. Under the typical mode of operation at this facility, when a full truckload quantity of material is accumulated (typically 70 - 80 drums), it will be shipped to a recycling center. The reason for the higher maximum quantity is to facilitate peaks in shipments of spent materials from generators, scheduling requirements, etc.

In the event that VW&R made an assessment that it were to initiate closing of this site as a hazardous waste storage facility, we are aware of the required 180 day notice period required by the EPA. In the event that closure of this facility were to be undertaken, notices would be sent to present generators employing our services to inform them of our pending discontinuation of receiving their waste materials. All materials shall be removed from the site within 90 days of receipt of the final volume of

waste and total closure activities will be completed with 180 days as required as a maximum.

Once formal approval of the planned closure procedures are received from the agency, the anticipated total time required to schedule trucks into the facility, load up all drummed material, and clean (if required) the containment area is a maximum of ten days. Although all inventory in storage at the time of closure would be presumed to be material destined for recycling, for computations of this closure plan we are assuming the inventory at closure will need to be disposed of. If, in fact, the waste inventory is capable of being recycled, such a mode of operation would be undertaken and the refined material could be sold through another of VW&R distribution branches.

Based upon this type of dealing with the materials on hand at the time of closure, the cost of closure would be greatly reduced because of the economic value realized from the sale of the refined material. Regardless, we have taken a "worst case" posture in calculating the cost of closure by assuming disposal.

VW&R does not foresee nor anticipate the need for requesting any extensions for closure time for this facility.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination were necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontamination material could be shipped along

with the other inventory for disposal. For purposes of this closure calculation, we are assuming a worst possible situation in calculating decontamination necessity. Decontamination would be accomplished by utilizing a pressurized steam cleaning unit.

All waste and waste containers will be disposed of through McKesson EnviroSystems.
As mentioned earlier, we would fully anticipate all waste items in storage at closure to be capable of being recycled, but for purposes of this calculation we are assuming that materials would be transferred to McKesson EnviroSystems.
No pretreatment would be required before material were readied for shipment. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. At most, a simple rinse-off utilizing the pressurized steam cleaning equipment would be necessary of the forklift.

It should be noted that VW&R at this location, does not have tanks which are utilized for the management of waste materials and thus, shall not be required to provide details of closure for such.

VW&R likewise does not have waste piles present at this location and thus, is not required to provide details of closure.

This closure plan and cost estimate will be kept on file at the VW&R facility. It shall be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It shall be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published index's available.

* or another permitted facility

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Because VW&R at this location functions only as a hazardous waste storage facility, notation is not necessary in the deed to inform potential purchasers of restrictions.

Following is a formal Closure Plan and calculations showing how the closure cost for the facility was calculated. Although this latter figure is valid, it may be construed as being unrealistically low - but even an increase by an order of magnitude (10X) would be adequately covered by VW&R financial assurance.

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CLOSURE PLAN

Facility I.D. Number OHD071107791

Owner or Operator: VW&R

Address: 26601 Richmond Road
Bedford Heights, OH

Telephone: (216) 292-7500

VW&R major business is that of nationwide distribution of organic and inorganic chemicals. It also provides various services to its customers, which may include picking up and transporting drummed materials of wastes to central recycling facilities. This may, at times, require temporary storage at our facility of some drummed materials in order to accumulate full truckloads.

1. Facility Conditions

A. General Information:

The facility size at this location is 20,500 sq. ft. of which only a small portion (e.g., loading docks) is used for handling of waste products which are accumulated from outside generators, and are destined for recycling once full truckloads are acquired. Waste storage is accumulated in the area outside the building, designated on the Layout Diagram. All unloading area floors are of impervious concrete. The designated storage area is made of impervious concrete. Total area utilized for waste storage is approximately 10 feet by 30 feet.

Fifty-five (55) gallon drums are the only storage method used. Drums are placed on wooden pallets (four (4) per pallet) and set within the containment area on the same pallet to minimize handling and potential spills.

The types of waste stored at this facility fall mainly into the following categories:

<u>E.P.A. WASTE NO.</u>	<u>DESCRIPTION</u>
F001	Spent halogenated solvents used in degreasing.
F002	Spent halogenated solvents.
F003	Spent non-halogenated solvents.
F004	Spent non-halogenated solvents.
F005	Spent non-halogenated solvents.

It should be noted that this facility only accumulated these items from outside generators for storage until a truckload quantity can be built up to make it economically feasible to ship to a Recycling facility. None of the above mentioned items are generated as a waste on-site.

B. Maximum amount of waste inventory is 120 (55) gallon drums (6600 gallons).

C. Equipment:

1. Forklift
2. Pallets

D. Closure Schedule:

1. Removal of Inventory - Total time to schedule trucks into facility, load drummed material, and clean (if necessary), and remove containment area is anticipated at a maximum of five (5) days.

Because this facility functions strictly as a storage facility with no transferring or treatment at the location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination was necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontaminated material could be shipped with inventory for recycling.

2. Removal Of Inventory:

All waste and waste containers will be sent to McKesson ^{*}Envirosystems (formerly Inland Chemical). We fully anticipate all materials in inventory at this facility to be capable of being recycled.

No pretreatment would be required before materials were readied for shipment. No treatment or disposal will occur at our location. Prior to loading, all drums are inspected for leakage, damage, and proper labeling. Proper manifest forms will be completed for the movement.

3. Facility Decontamination:

- A. The floor of the diked containment area will be steam cleaned using water and the resulting residual placed in a 55 gallon drum for disposal.
- B. Amount of waste generated from decontaminant, if required, would not exceed one (1) 55 gallon drum.
- C. All wooden pallets used with waste storage would be shipped at the same time as inventory to be landfilled, if they were found to be unfit for further usage.

* or another permitted facility

Van Waters & Rogers, Inc.

Closure and Post-Closure Plans

(40 CFR Sec. 122.25(a)(13), 264.111 - 264.120, 264.78, 264.197

264.258, 122.25(a)(14), 122.25(a)(15), 264.142)

This section outlines the steps which the subject, VW&R storage facility will follow in a closure situation in order to comply with applicable sections as outlined in the Resource Conservation and Recovery Act.

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partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this activity is the sole reason for VW&R being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility. For this reason, partial closure will not be addressed.

It should be further noted that because of the nature of the activity at this facility, that accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility, a post-closure plan will not be required because materials are being continually removed from this facility; in a closure situation, all materials would be removed in a similar fashion as practiced in routine day-to-day business.

VW&R will maintain a copy of this closure plan at the facility. The Company is aware that should this facility contemplate

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closure of the site, the EPA, Regional Administrator, and the comparable state agency must be notified at least 180 days prior to the date that the Company closes the facility.

VW&R will continue to operate business at this facility as long as it is deemed economically viable by the Company, and so long as its operation is otherwise permitted by applicable law. The Company is thus, at this time, unable to specify anticipated date of closure.

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both VW&R and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved closure plan.

Procedures developed by VW&R for managing waste materials are designed to ensure the facility's compliance with applicable laws, and to eliminate any necessity for further maintenance or control to prevent threats to human health or the environment. As outlined in the section entitled "Secondary Containment System Design and Operation", any evidence of unintentional leakage and subsequent containment will be sampled and analyzed to determine the specific contaminant and degree of clean up necessary. All contaminated materials will be removed and disposed of at a permitted disposal facility. The containment area shall be regraded to the original design in the event of surface material removal. The container(s) which indicate release of material shall be found, segregated, and handled in the proper manner to alleviate further release of material in accordance with Company procedures. The incident shall be reported and documented as appropriate based upon severity

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and circumstances.

Due to the nature of VW&R involvement in hazardous waste management, it becomes extremely difficult to be specific on the maximum quantities and types of material which would be on hand in a closure situation.

Factors such as economic conditions, seasonal trends, and market growth will impact a particular generator's rate of use of materials, and thus affect the amount of materials shipped to this location for temporary storage and eventual recycling.

In no case, will this facility store more than 110 55 gallon drums at any one time. In the majority of cases, the maximum number of containers held at any one time will be below this quantity. Under the typical mode of operation at this facility, when a full truckload quantity of material is accumulated (typically 70 - 80 drums), it will be shipped to a recycling center. The reason for the higher maximum quantity is to facilitate peaks in shipments of spent materials from generators, scheduling requirements, etc.

In the event that VW&R made an assessment that it were to initiate closing of this site as a hazardous waste storage facility, we are aware of the required 180 day notice period required by the EPA. In the event that closure of this facility were to be undertaken, notices would be sent to present generators employing our services to inform them of our pending discontinuation of receiving their waste materials. All materials shall be removed from the site within 90 days of receipt of the final volume of

RG:6
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waste and total closure activities will be completed with 180 days as required as a maximum.

Once formal approval of the planned closure procedures are received from the agency, the anticipated total time required to schedule trucks into the facility, load up all drummed material, and clean (if required) the containment area is a maximum of ten days. Although all inventory in storage at the time of closure would be presumed to be material destined for recycling, for computations of this closure plan we are assuming the inventory at closure will need to be disposed of. If, in fact, the waste inventory is capable of being recycled, such a mode of operation would be undertaken and the refined material could be sold through another of VW&R distribution branches.

Based upon this type of dealing with the materials on hand at the time of closure, the cost of closure would be greatly reduced because of the economic value realized from the sale of the refined material. Regardless, we have taken a "worst case" posture in calculating the cost of closure by assuming disposal.

VW&R does not foresee nor anticipate the need for requesting any extensions for closure time for this facility.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination were necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontamination material could be shipped along

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with the other inventory for disposal. For purposes of this closure calculation, we are assuming a worst possible situation in calculating decontamination necessity. Decontamination would be accomplished by utilizing a pressurized steam cleaning unit.

All waste and waste containers will be disposed of through McKesson EnviroSystems.^{*} As mentioned earlier, we would fully anticipate all waste items in storage at closure to be capable of being recycled, but for purposes of this calculation we are assuming that materials would be transferred to McKesson EnviroSystems.^{*} No pretreatment would be required before material were readied for shipment. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. At most, a simple rinse-off utilizing the pressurized steam cleaning equipment would be necessary of the forklift.

It should be noted that VW&R at this location, does not have tanks which are utilized for the management of waste materials and thus, shall not be required to provide details of closure for such.

VW&R likewise does not have waste piles present at this location and thus, is not required to provide details of closure.

This closure plan and cost estimate will be kept on file at the VW&R facility. It shall be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It shall be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published index's available.

* or another permitted facility

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BES

Van Waters & Rogers Inc.

Closure and Post-Closure Plans

Page 6

Because VW&R at this location functions only as a hazardous waste storage facility, notation is not necessary in the deed to inform potential purchasers of restrictions.

Following is a formal Closure Plan and calculations showing how the closure cost for the facility was calculated. Although this latter figure is valid, it may be construed as being unrealistically low - but even an increase by an order of magnitude (10X) would be adequately covered by VW&R financial assurance.

Revised
DEC

CLOSURE PLAN

Facility I.D. Number OHD071107791

Owner or Operator: VW&R

Address: 26601 Richmond Road
Bedford Heights, OH

Telephone: (216) 292-7500

VW&R major business is that of nationwide distribution of organic and inorganic chemicals. It also provides various services to it's customers, which may include picking up and transporting drummed materials of wastes to central recycling facilities. This may, at times, require temporary storage at our facility of some drummed materials in order to accumulate full truckloads.

1. Facility Conditions

A. General Information:

The facility size at this location is 20,500 sq. ft. of which only a small portion (e.g., loading docks) is used for handling of waste products which are accumulated from outside generators, and are destined for recycling once full truckloads are acquired. Waste storage is accumulated in the area outside the building, designated on the Layout Diagram. All unloading area floors are of impervious concrete. The designated storage area is made of impervious concrete. Total area utilized for waste storage is approximately 10 feet by 30 feet.

Fifty-five (55) gallon drums are the only storage method used. Drums are placed on wooden pallets (four (4) per pallet) and set within the containment area on the same pallet to minimize handling and potential spills.

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DEC 22 1988

The types of waste stored at this facility fall mainly into the following categories:

<u>E.P.A. WASTE NO.</u>	<u>DESCRIPTION</u>
F001	Spent halogenated solvents used in degreasing.
F002	Spent halogenated solvents.
F003	Spent non-halogenated solvents.
F004	Spent non-halogenated solvents.
F005	Spent non-halogenated solvents.

It should be noted that this facility only accumulated these items from outside generators for storage until a truckload quantity can be built up to make it economically feasible to ship to a Recycling facility. None of the above mentioned items are generated as a waste on-site.

B. Maximum amount of waste inventory is 120 (55) gallon drums (6600 gallons).

C. Equipment:

1. Forklift
2. Pallets

D. Closure Schedule:

1. Removal of Inventory - Total time to schedule trucks into facility, load drummed material, and clean (if necessary), and remove containment area is anticipated at a maximum of five (5) days.

Because this facility functions strictly as a storage facility with no transferring or treatment at the location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination was necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontaminated material could be shipped with inventory for recycling.

2. Removal Of Inventory:

All waste and waste containers will be sent to McKesson EnviroSystems (formerly Inland Chemical). We fully anticipate all materials in inventory at this facility to be capable of being recycled.

No pretreatment would be required before materials were readied for shipment. No treatment or disposal will occur at our location. Prior to loading, all drums are inspected for leakage, damage, and proper labeling. Proper manifest forms will be completed for the movement.

3. Facility Decontamination:

- A. The floor of the diked containment area will be steam cleaned using water and the resulting residual placed in a 55 gallon drum for disposal.
- B. Amount of waste generated from decontaminant, if required, would not exceed one (1) 55 gallon drum.
- C. All wooden pallets used with waste storage would be shipped at the same time as inventory to be landfilled, if they were found to be unfit for further usage.

* or another permitted facility

VW&R Closure Cost Estimate

Bedford Heights Branch

<u>I. Basic Disposal Charge</u>	
110 drums at \$65.00	\$7,150.00
<u>II. Warehouse Labor (Loading)</u>	
Hourly rate including fringe benefits - 3 hours required.	\$33.98
<u>III. Transportation</u>	
To McKesson EnviroSystems, New Castle, Kentucky 321 miles @ \$1.50/mile — two loads.	\$963.00
<u>IV. Equipment Cost</u>	
Forklift at \$4.50/hour	\$13.50
<u>V. Decontamination Cost</u>	
Secondary Containment Area Cleaning 2 hours @ \$30.00/hour	\$60.00
Disposal of Cleanup residue 2 drums @ \$65.00	\$130.00
Disposal of Pallets	\$100.00
Laboratory Services	<u>\$100.00</u>
	\$390.00
VI. Contingencies at 20% of Subtotal of \$8550.48	\$1710.10
VII. Engineer Certification	\$300.00
<u>Total Cost of Closure</u>	\$10,560.58*

- *Revised closure cost as of June 27, —
1986: \$12,565

Revised
DEC 22 1986

GRAHAM & JAMES

ONE MARITIME PLAZA

THIRD FLOOR

SAN FRANCISCO, CALIFORNIA 94111

TELEPHONE (415) 954-0200

TELEX

W.U.340143 CHALGRAY SFO
M.C.I. 67565 GJ SFO

FACSIMILE

GI/II (415) 391-5906
GII/III (415) 391-2493

CABLE

CHALGRAY, SAN FRANCISCO, CA

WRITER'S DIRECT DIAL NUMBER

OTHER OFFICES
LOS ANGELES, CA
LONG BEACH, CA
NEWPORT BEACH, CA
PALO ALTO, CA
NEW YORK, NY
WASHINGTON, DC
RALEIGH, NC
SINGAPORE
HONG KONG
MILAN

AFFILIATED OFFICE
KUWAIT

October 31, 1986

Director, Ohio EPA
Attn: Tom Crepeau
Division of Solid & Hazardous
Waste Management
Box 1049
261 E. Broad St.
Columbus, OH 43216

Re: Financial Assurance for Closure and Sudden
Accidental Occurrence Liability for the Cincinnati,
Cleveland/Bedford Heights & Columbus, OH Facilities

Dear Mr. Crepeau:

To demonstrate Van Waters & Rogers Inc.'s compliance with the financial assurance requirements of your state, we enclose executed certificates of insurance to cover closure costs and liability for sudden accidental occurrences for the above-referenced facilities. The certificates of insurance are issued by National Union Fire Insurance Company of Pittsburgh, PA, and are effective as of October 31, 1986.

Very truly yours,

Robert C. Thompson
Robert C. Thompson
of
GRAHAM & JAMES

RCT:NK

cc: EPA Region V
Attn: RCRA Division, Ohio Branch

Mr. Fran Netting
Motor Carrier Registration

Enclosures

PAKN52A4

Hazardous Waste Facility Certificate of
Liability Insurance

1. National Union Fire Insurance Company of Pittsburgh, PA (the "Insurer"), of 70 Pine Street, New York, N.Y. 10270 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Van Waters & Rogers, Inc. (the "Insured"), of 1600 Norton Building, Seattle, Washington 98104, in connection with the insured's obligation to demonstrate financial responsibility under rules 3745-55-47 and 3745-66-47 of the Administrative Code. The coverage applies to the facility(ies) listed on Schedule 1 attached hereto for sudden accidental occurrences. The limits of liability are \$1,000,000 for each occurrence with an annual aggregate of at least \$2,000,000, exclusive of legal defense costs. The coverage is provided under policy number ^{PRM} 7063043, issued on October 31, 1986. The effective date of said policy is October 31, 1986.

2. The Insurer further certifies the following with respect to the insurance described in paragraph 1.

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a

right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code.

(c) Whenever requested by the Director of the Ohio Environmental Protection Agency, the insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the insurer or the insured, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the Director.

(e) Any other termination of the Insurance will be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the

Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of Authorized
Representative of Insurer


Type name JOSEPH F. SANDER

Title Assistant Secretary
Authorized Representative
of NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURG, PA
New York, NY

SCHEDULE 1

LIST OF FACILITIES -- OHIO

1. Name: Cincinnati Area Office
2. Address: 3025 Exon Avenue
Cincinnati, OH 45241
3. Tel. No. (513) 563-2440
4. Facility Manager/Contact: Ivan Byers
5. EPA Identification No.: #OHD002899847
6. Current Closure Cost Estimate: \$11,521*

1. Name: Cleveland/Bedford Heights
2. Address: 26601 Richmond Drive
Bedford Heights, OH 44146
3. Tel. No. (216) 292-7500
4. Facility Manager/Contact: Cliff Moll
5. EPA Identification No.: #OHD071107791
6. Current Closure Cost Estimate: \$12,565*

*All closure costs revised as of June 27, 1986.

Certificate of Insurance for
Closure Care

Name and address of Insurer (herein called the "Insurer"):

National Union Fire Insurance Company
of Pittsburg, PA
70 Pine Street, New York, N.Y. 10270

Name and address of Insured (herein called the "Insured"):

Van Waters & Rogers, Inc.
1600 Norton Building
Seattle, Washington 98104

Facilities covered: See attached Schedule 1.

Face amount: \$364,036.00

Policy number: PRM 7063043

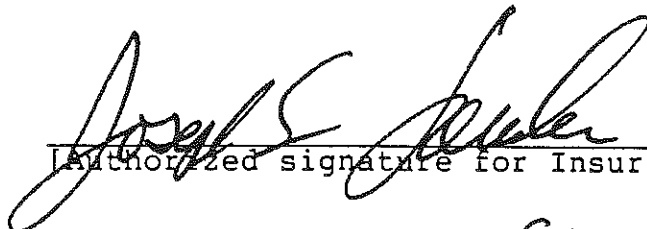
Effective date: October 31, 1986

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of

paragraph (E) of rule 3745-55-43, 375-55-45, and paragraph (D) of rule 3745-66-43 and 3745-66-45 of the Administrative Code, as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in paragraph (E) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.


[Authorized signature for Insurer]

JOSEPH E. SANDER
[Name of person signing]

Assistant Secretary
[Title of person signing]

Mercedes Corduro
Signature of witness or notary

10/28/86
[Date]

SCHEDULE 1

LIST OF FACILITIES -- OHIO

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6. Current Closure Cost Estimate: \$12,565*

*All closure costs revised as of June 27, 1986.

Van Waters & Rogers Inc.

Other Federal Laws

(40 CFR Sec. 122.25(a)(20), 122.12)

Information will be provided in accordance with the requirements of 40 CFR 122.25(a)(20) at the request of the Environmental Protection Agency Regional office. At this time, we believe this facility is in compliance with the following Federal laws:

Wild and Scenic Rivers Act

National Historic Preservation Act of 1966

Endangered Species Act

Coastal Zone Management Act

Fish and Wildlife Coordination Act

Revised
DEC 22 1986

Van Waters & Rogers Inc.

Secondary Containment System Design and Operation

(40 CFR Sec. 122.25(b)(1))

All 55 gallon steel containers which will be utilized to store off-site generators' waste materials at a VW&R storage facility will be held pending reshipment in a designated secondary containment area.

The active outside storage area of the facility as shown in the Part A plot plan (revised from the original version submitted to Region V dated November 18, 1980) consists of a concrete paved area approximately 45,000 square feet in size to the West and North of the warehouse. The yard area is concrete at least six inches thick.

The waste storage containment area is planned to be a bermed rectangle 9 inches high, 10 feet by 30 feet. It will be located at right angles to the warehouse wall, about 15 feet from the ramp — providing forklift access from the warehouse to the yard. The base of the bermed area is of concrete with a compressive strength of at least 3000 psi. The 9 inch berm is also concrete. The heaviest drum of waste material to be handled at this facility would not exceed 700 pounds; maximum load on the concrete surface would be four such drums stacked two-high. The rectangular design of the containment area permits a double row of six pallets each. A permanent layer of pallets will be placed inside the rectangle. Enough space is available on both long sides of the rectangle (30 feet) so that pallets of drums of waste material can easily be placed onto or taken off the permanent pallet layer over the berm by conventional forklift maneuvering. This arrangement of containers also facilitates inspection of individual drums for any leakage. The concrete base and its junction with the berm or integral and no leakage outside the containment area can occur.

Revised
DEC 22 1980

Van Waters & Rogers Inc.

Secondary Containment System Design and Operation
Page 2.

This secondary containment area can contain 1683 gallons of waste liquid at capacity calculated as follows:

30 feet X 10 feet X 9 inches = 225 cubic feet

1 cubic foot = 7.48 gallons

225 cubic feet X 7.48 = 1683 gallons

The anticipated maximum number of 55 gallon drums of material to be stored within the 10 foot by 30 foot storage areas at any one time is 110. Given a minimum outage in a given drum of 1 gallon, at the maximum anticipated storage quantity of drums, a total of 5940 gallons of material would be present. Utilizing the required 10% containment ratio of the total volume of the maximum number of containers of material stored, the concrete bermed containment area would be required to hold 594 gallons.

The difference between the 1683 and 594 gallon figure (1089 gallons) is considered sufficient to provide for substantial rainfall (or melted snow) in addition to the required allowance for drum leakage. Statistics provided by the Soil Conservation Service of the U.S. Department of Agriculture for this part of Ohio indicate a 100-year, 24-hour rainfall to be no more than 5 inches. This translates in a 300 square foot area to be 125 cubic feet, or 935 gallons. The total of 594 gallons (potential leak) and 935 gallons (100-year incident) is well within the capacity of the projected bermed containment area.

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Van Waters & Rogers Inc.

Secondary Containment System Design and Operation

Page 3.

Should any waste material leakage from drum(s) be present in the containment berm area, a sample will be drawn and taken to a laboratory for analysis if the source of the contamination is not obvious. All released liquid present in the bermed area will be collected and placed into drums by use of a portable pump. Logging and necessary reports as warranted by the nature and severity of any such incident will be made to the appropriate Company personnel and Government agencies.

Since all containers while in storage remain on a double layer of wood pallets, contact of the drums with any accumulated liquid inside the bermed area is impossible.

This facility of VW&R is compact, and the bermed secondary containment area will be so located that it is under constant scrutiny. Certainly the level of any accumulated precipitation will be checked promptly as such weather conditions occur, recognizing the need to prevent overflow. If the appearance of any such accumulation raises suspicion that it might be contaminated, it will be sampled and tested either at a local testing laboratory or a VW&R laboratory before it is discharged. The accumulated liquid is to be emptied promptly once any significant level of liquid is reached, recognizing the need to maintain the contained area as empty as possible in case of a spill. An emptying procedure that has proved satisfactory at other VW&R locations is to locate a manually-operated valve through the narrow dimension of the bermed rectangle. A sample can be drawn through this outlet and inspected for odor, cloudiness, or an insoluble layer of liquid — all signifying possible contamination — prior to release to the sewer.

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DEC 22 1966

Van Waters & Rogers Inc.

Secondary Containment System Design and Operation
Page 4.

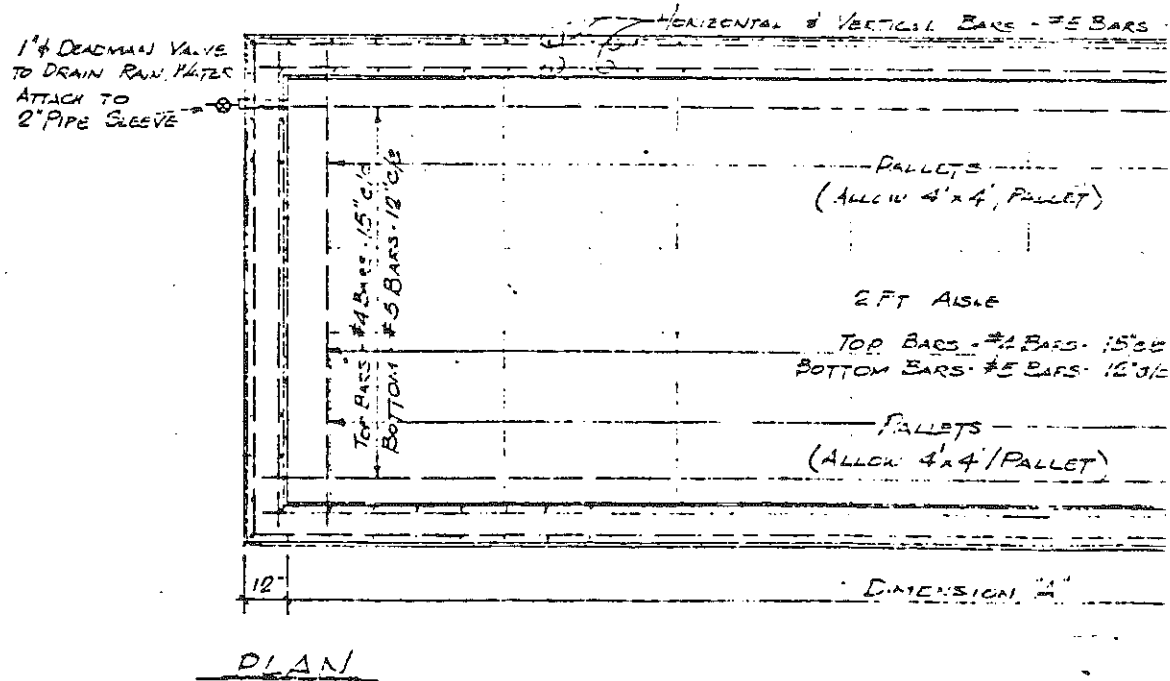
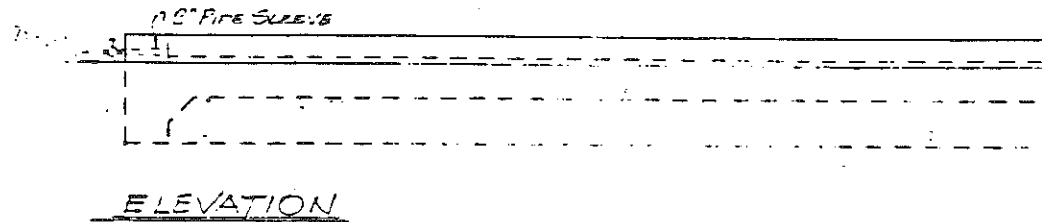
In order to facilitate taking any samples necessary, as well as to insure maximum drainage of the containment area, a sump will be installed in the lowest point within the berm. The branch will have in its possession an appropriate pump, available at all times.

701-1000
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ITEM	DESCRIPTION	QTY	UNIT	PRICE
4	(112) DRUMS	50	10'	5"
10	(256) DRUMS	20	10'	5"
5	(40) DRUMS	20	5'	6"
7	(56) DRUMS	50	5'	6"

GENERAL NOTES:

1. ALL MATERIALS TO BE SUPPLIED BY CONTRACTOR
2. ALL DIMENSIONS TO BE GIVEN IN FEET AND INCHES
3. MATERIALS TO BE USED AS SHOWN ON COVER



4 - 55 GAL. DRUMS / PALLET
2 PALLETS HIGH

PERSPECTIVE

BOTTOM BARS
#5-12" O/C
EACH WAY

TYPICAL SECTION
SCALE: $\frac{3}{8}'' = 1'-0''$

(TYPICAL)

12

DIMENSION "B"

12

CONSTRUCTION MNGMNT & DESIGN
450 CEDAR LANE
RIVERVALE, N.J. 07842

PROJECT

DRAWING

CONTAINMENT PAN
FOR STORAGE OF DRUMS
WITH CHEMICAL WASTE

PROFESSIONAL REGULATION

[illegible]

CONFESSIONS LIT. 115

H.Y. - 29316	G.S. - 10791
Leak 821098-C	S.H. - 5 405-49
Memo -	Cum. - 103 10
Air -	F.R. - 80 107709

Frank E. Quinn

STANN HT

CHAD 2Y

DATE _____

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These plans are being submitted for review and are the property of the National Management Association.

CONTINGENCY PLAN

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 - B. LOCAL AUTHORITIES
 - C. REGULATORY AGENCIES
 - D. OUTSIDE CONTRACTOR HELP
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- VI. EMERGENCY EQUIPMENT
- VII. EVACUATION
- VIII. EMERGENCY PLAN - FIRE
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 - B. STATE HAZARDOUS WASTE TRANSPORT CONTINGENCY PLANS
 - C. STATE POLLUTION INCIDENT PREVENTION PLAN
 - D. OTHER

I. OBJECTIVES

THIS VOLUME HAS TWO MAJOR PURPOSES:

- A. TO PROVIDE INFORMATION AND TO ASSIGN RESPONSIBILITIES TO ENABLE BRANCH PERSONNEL TO UNDERTAKE ACTIONS THAT WILL MINIMIZE ANY THREAT TO THE FACILITY EMPLOYEES, RESIDENTIAL AND BUSINESS NEIGHBORS, COMPANY AND ADJOINING PROPERTY, AND TO THE ENVIRONMENT. THE PLAN IS DESIGNED TO PROVIDE A TOTAL FACILITY RESPONSE PROGRAM APPLICABLE TO ANY EMERGENCY; IN ADDITION, RESPONSES REQUIRED IN THE EVENT OF A SPECIFIC TYPE OF EMERGENCY - FIRE, CHEMICAL SPILL, ETC. - ARE SPELLED OUT.
- B. TO PROVIDE A MEANS OF KEEPING IN ONE PLACE, READILY ACCESSIBLE, THE EVER-INCREASING NUMBER OF AUXILLIARY CONTINGENCY PLANS (FOR EXAMPLE, HAZARDOUS WASTE TRANSPORT, MICHIGAN'S POLLUTION INCIDENT PREVENTION PLAN, PENNSYLVANIA'S PREPAREDNESS PREVENTION, AND CONTINGENCY PLAN, THE USEPA'S 40 CFR 264, SUBPART D) REQUIRED BY STATE AND FEDERAL REGULATORY AGENCIES.

THE DATA ARE ORGANIZED SO THAT CHANGES IN PERSONNEL, PROCEDURES, AND REGULATIONS CAN BE EASILY INCORPORATED INTO THE BOOK AS THEY OCCUR, INSURING THAT ALL INFORMATION IS UP-TO-DATE.

ADDITIONAL DETAILS FOR PROCEDURES OUTLINED IN THIS PLAN ARE TO BE FOUND IN TWO OTHER VW&R DOCUMENTS IN THE POSSESSION OF EACH EASTERN REGION BRANCH:

- 1. THE CHEMICAL OPERATIONS MANUAL
- 2. THE SAFETY TRAINING AND MAINTENANCE DOCUMENTATION MANUAL

DEC 22 1985

II. DISTRIBUTION

EACH BRANCH WILL RECEIVE AND MAINTAIN A COPY OF THIS PLAN. IT IS TO BE KEPT IN A REASONABLY ACCESSIBLE LOCATION BY THE BRANCH OPERATIONS MANAGER.

COPIES OF THE COMPLETE PLAN ARE TO BE DISTRIBUTED TO ALL EMERGENCY SERVICES REASONABLY EXPECTED TO BE CALLED UPON IN THE EVENT OF AN EMERGENCY INVOLVING THE BRANCH. THESE RECIPIENTS ARE TO ACKNOWLEDGE IN WRITING THEIR RECEIVING A COPY OF THE PLAN AND A COPY OF THE RECEIPT SENT TO THE REGIONAL OPERATIONS DEPARTMENT:

THE LOCAL POLICE DEPARTMENT

THE LOCAL FIRE DEPARTMENT

THE LOCAL HOSPITAL/EMERGENCY ROOM

THE CLOSEST STATE POLICE OFFICE

DEPENDING ON THE LOCALITY, THERE MAY BE OTHER ORGANIZATIONS THAT COULD/WILL RECEIVE A COPY:

RESCUE TEAMS

EMERGENCY AMBULANCE CORPS

IN ADDITION, COPIES OF THE PLAN ARE TO BE DISTRIBUTED WITH A LETTER OF TRANSMITTAL TO:

THE USEPA

THE STATE EPA

THE EASTERN REGION OPERATIONS DEPARTMENT

COPIES OF ALL RECEIPTS AND LETTERS OF TRANSMITTAL ARE TO BE FILED IN THIS SECTION OF THE PLAN

III. THE BRANCH SAFETY ORGANIZATION

RESPONSIBILITY FOR THE BRANCH'S SAFETY PROGRAM LIES WITH THE BRANCH MANAGER.

ALTHOUGH EXACTLY HOW A BRANCH'S PERSONNEL ARE ORGANIZED TO IMPLEMENT THIS PLAN DEPENDS UPON THE BRANCH'S SIZE, THE CHEMICALS IT INVENTORIES, THE EXISTENCE AND EXTENT OF A REPACKING INSTALLATION, AND ITS INVOLVEMENT WITH HAZARDOUS WASTES, IMPLEMENTATION OF THIS PLAN REQUIRES AN EMERGENCY COORDINATOR AND AN ALTERNATE EMERGENCY COORDINATOR.

USUALLY THE BRANCH MANAGER RESERVES FOR HIMSELF ONE OF THESE FUNCTIONS AND DELEGATES THE OTHER. ALTHOUGH THE ALTERNATE COORDINATOR IS SECOND-IN-COMMAND, HE MUST BE FULLY QUALIFIED TO TAKE OVER ALL THE FUNCTIONS OF THE PRIMARY COORDINATOR.

IN ADDITION TO THESE TWO POSITIONS, THE FOLLOWING ASSIGNMENTS MUST BE PROVIDED FOR:

FIRST AID TEAM LEADER

FIRE RESPONSE TEAM LEADER

ASSEMBLY POINT LEADER(S)

RESPECTIVE RESPONSIBILITIES OF THESE FUNCTIONS FOLLOWS.

III. THE BRANCH SAFETY ORGANIZATION

A. BRANCH MANAGER

IT SHALL BE THE RESPONSIBILITY OF THE BRANCH/PLANT MANAGER, WITH THE ASSISTANCE OF THE REGIONAL OPERATIONS STAFF TO IMPLEMENT THIS PROCEDURE.

1. PERSONNEL - HE WILL INSURE THAT:

- A) A BRANCH EMERGENCY COORDINATOR IS DESIGNATED AND THAT THIS INDIVIDUAL CARRIES OUT HIS RESPONSIBILITIES, INCLUDING ASSURANCE THAT HE HAS THE PROPERLY TRAINED PEOPLE AND EQUIPMENT TO IMPLEMENT THIS PROGRAM.
- B) ALL PERSONNEL ASSIGNED TO HIM ARE AWARE OF THEIR RESPONSIBILITIES TOWARDS THIS PROGRAM, INCLUDING THE HAZARDS OF THE PRODUCTS DISTRIBUTED AND THE IMMEDIATE REACTION TO POTENTIAL EMERGENCIES RELATED TO THESE PRODUCTS AND VW&R BUSINESS.
- C) SELECTED BRANCH PERSONNEL ARE TRAINED IN:
 - FIRST AID
 - AIR PACKS
 - GAS MASKS
 - CHLORINE EMERGENCY KITS (AS DESIGNATED BY THE REGIONAL OPERATIONS & SAFETY MANAGER).
- D) ALL BRANCH PERSONNEL ARE TRAINED IN THE USE OF FIRE EXTINGUISHERS.
- E) ALL PERSONNEL PARTICIPATE IN A SEMIANNUAL TRAINING DRILL.

2. EQUIPMENT - HE WILL INSURE THAT ALL EQUIPMENT IDENTIFIED IN THIS PLAN IS ON HAND, IS IN OPERATING CONDITION AND IS SPECIFICALLY IDENTIFIED AND SET ASIDE FOR USE UPON IMPLEMENTATION OF THIS PROGRAM, AS APPLICABLE.

DEL

III. THE BRANCH SAFETY ORGANIZATION

A. BRANCH MANAGER CONT'D.

3. PLAN - HE WILL ENSURE THAT THIS EMERGENCY/CONTINGENCY PROGRAM FOR HIS FACILITY IS COMPLETE AND IS UPDATED QUARTERLY.
4. DOCUMENTATION - HE WILL ENSURE THAT ALL EMPLOYEE TRAINING IS DOCUMENTED, AND THAT DISTRIBUTION OF THIS PLAN TO APPROPRIATE GOVERNMENT AUTHORITIES IS RECEIPTED.

III. THE BRANCH SAFETY ORGANIZATION

B. BRANCH EMERGENCY COORDINATOR

IT SHALL BE THE RESPONSIBILITY OF THE FACILITY EMERGENCY COORDINATOR, WITH THE ASSISTANCE OF THE REGIONAL OPERATIONS STAFF, TO EXECUTE THIS PROCEDURE.

1. PERSONNEL - HE WILL INSURE THAT:

- A) ALL PERSONNEL WORKING AT THE FACILITY (TO INCLUDE TEMPORARY HELP AND CONTRACTORS) ARE AWARE OF THEIR RESPONSIBILITIES TOWARDS THIS PROGRAM, INCLUDING THE HAZARDS OF THE PRODUCTS DISTRIBUTED AND THE IMMEDIATE REACTION TO POTENTIAL EMERGENCIES RELATED TO THESE PRODUCTS AND VW&R BUSINESS.
- B) SELECTED BRANCH PERSONNEL ARE TRAINED IN:
 - FIRST AID
 - AIR PACKS
 - GAS MASKS
 - CHLORINE EMERGENCY KITS (AS DESIGNATED BY THE REGIONAL OPERATIONS AND SAFETY MANAGER).
- C) ALL BRANCH PERSONNEL ARE TRAINED IN THE USE OF FIRE EXTINGUISHERS.
- D) ALL PERSONNEL PARTICIPATE IN A SEMIANNUAL TRAINING DRILL.
- E) PERSONNEL ARE ASSIGNED TO AND TRAINED TO PERFORM THE POSITIONS SPECIFIED IN THE:
 - FIRE FIGHTING TEAM
 - FIRST AID
- F) PERSONNEL ARE AWARE OF THEIR RESPONSIBILITIES AS OUTLINED IN THE FACILITY EVACUATION PLAN.
- G) ARRANGEMENTS WITH LOCAL AUTHORITIES ARE DOCUMENTED.
- H) APPROPRIATE FEDERAL, STATE, AND LOCAL AGENCIES ARE NOTIFIED AS APPLICABLE.

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DEC 22

III. THE BRANCH SAFETY ORGANIZATION

B. BRANCH EMERGENCY COORDINATOR CONT'D.

1. PERSONNEL CONT'D.

I) APPROPRIATE CHEMICAL COMPANY OFFICERS ARE NOTIFIED AS APPLICABLE.

J) IN THE EVENT OF IMMINENT OR ACTUAL EMERGENCY, HE MUST EXECUTE THE PROCEDURE TO INCLUDE:

1. NOTIFY ALL CONCERNED OF THE SITUATION TO INCLUDE PLANT PERSONNEL AND NEIGHBORS, AS APPLICABLE. (SEE PHONE NUMBERS IN SECTION IV OF THIS PROGRAM.)

2. ANALYZE THE EMERGENCY SITUATION.

3. TAKE THE APPROPRIATE CORRECTIVE ACTION.

4. SECURE THE EMERGENCY SCENE.

5. CLEAN THE EMERGENCY SCENE.

K) ALL APPLICABLE REPORTS TO COMPANY AND GOVERNMENT AGENCIES ARE FILED AS APPROPRIATE.

2. EQUIPMENT - INSURE ALL EQUIPMENT IDENTIFIED IN THIS PROCEDURE IS ON HAND, IS IN OPERATING CONDITION, AND IS SPECIFICALLY IDENTIFIED AND SET ASIDE FOR USE UPON IMPLEMENTATION OF THIS PROGRAM, AS APPLICABLE. INSURE THAT AN INVENTORY OF THE ABOVE EQUIPMENT IS TAKEN AND THAT THIS INVENTORY IS DOCUMENTED.

3. AUTHORITY - HE HAS THE AUTHORITY TO COMMIT ALL AVAILABLE RESOURCES REQUIRED TO IMPLEMENT THIS PLAN.

III. THE BRANCH SAFETY ORGANIZATION

C. FIRST AID TEAM LEADER

IT SHALL BE THE RESPONSIBILITY OF THE FIRST AID TEAM LEADER WITH THE ASSISTANCE OF AND UNDER THE DIRECTION OF THE BRANCH EMERGENCY COORDINATOR TO INSURE THAT ALL PERSONNEL ASSIGNED A RESPONSIBILITY IN THE FIRST AID TEAM ARE FAMILIAR WITH THE HAZARDS OF THE PRODUCTS HANDLED BY THE BRANCH AND THAT THEY ARE AWARE OF THE IMMEDIATE ACTION NECESSARY TO COUNTER POTENTIAL EMERGENCIES RELATED TO THESE PRODUCTS.

HE WILL INSURE THAT ALL EQUIPMENT FOR USE BY THE FIRST AID TEAM IS:

1. ON HAND
2. IN OPERATING CONDITION
3. SPECIFICALLY IDENTIFIED AND SET ASIDE FOR USE BY THE
FIRST AID TEAM

III. THE BRANCH SAFETY ORGANIZATION

D. FIRE RESPONSE TEAM LEADER

IT SHALL BE THE RESPONSIBILITY OF THE FIRE RESPONSE TEAM LEADER, WITH THE ASSISTANCE OF AND UNDER THE DIRECTION OF THE BRANCH EMERGENCY COORDINATOR TO EXECUTE THIS PORTION OF THE PROCEDURE.

1. PERSONNEL -

- A) SELECT AN ALTERNATE
- B) SELECT MEMBERS OF THE FIRE FIGHTING TEAM
- C) INSURE THAT ALL PERSONNEL DESIGNATED A RESPONSIBILITY IN THE FIRE RESPONSE TEAM IS AWARE OF THAT RESPONSIBILITY AND IS TRAINED TO DO IT.
- D) INSURE THAT ALL PERSONNEL DESIGNATED A RESPONSIBILITY IN THE FIRE RESPONSE TEAM ARE FAMILIAR WITH THE HAZARDS OF THE PRODUCTS DISTRIBUTED AND THAT HE IS AWARE OF THE IMMEDIATE ACTION NECESSARY TO COUNTER POTENTIAL EMERGENCIES RELATED TO THESE PRODUCTS.
- E) INSURE THAT MEMBERS OF THE FIRE RESPONSE TEAM UNDERSTAND THAT THEY ARE NEITHER TRAINED NOR EQUIPPED TO HANDLE A MAJOR FIRE. THEY MUST KNOW THE LIMIT OF THEIR TRAINING AND EQUIPMENT AND ALWAYS STAY WITHIN THESE LIMITS.

2. EQUIPMENT - INSURE THAT ALL EQUIPMENT IDENTIFIED IN THE PROCEDURE FOR USE BY THE FIRE RESPONSE TEAM IS:

- A) ON HAND
- B) IN OPERATING CONDITION
- C) SPECIFICALLY IDENTIFIED AND SET ASIDE FOR USE BY THE FIRE RESPONSE TEAM, AS APPLICABLE.

3. PLAN - INSURE THAT:

- A) THE FIRE REACTION PLAN IS COMPLETE AND CURRENT.
- B) DEFICIENCIES IDENTIFIED IN THE FIRE REACTION TEAM, IN ANY

III. THE BRANCH SAFETY ORGANIZATION

D. FIRE RESPONSE TEAM LEADER CONT'D.

B) CONT'D.

AREA, TO INCLUDE PERSONNEL, EQUIPMENT OR PLANNING, IS BROUGHT
TO THE ATTENTION OF THE EMERGENCY REACTION TEAM LEADER IMMEDIATELY.

III. THE BRANCH SAFETY ORGANIZATION

E. ASSEMBLY POINT LEADER(S)

NORMALLY, THERE SHOULD BE AN ASSEMBLY POINT LEADER FOR THE THREE AREAS OF A BRANCH - OFFICE, WAREHOUSE, YARD. IT SHALL BE THEIR RESPONSIBILITY TO:

1. PROCEED DIRECTLY TO THE ASSEMBLY AREA AS PRESCRIBED IN THE EVACUATION PLAN.
2. ACCOUNT FOR ALL PERSONNEL ASSIGNED TO THE AREA AND REPORT ANY ABSENCES TO THE EMERGENCY COORDINATOR.
3. KEEP PERSONNEL IN ASSEMBLY AREA TOGETHER AND CALM.
4. TAKE AN INDUSTRIAL FIRST AID KIT TO THE ASSEMBLY AREA.
5. TURN OFF THE MAIN ELECTRICAL POWER SWITCH IN THE BUILDING.

ASSIGNMENTS

EMERGENCY COORDINATOR:

NAME Ed Welsh
HOME ADDRESS 1466 Bradford Street
Macedonia, OH
HOME PHONE (216) 467-2068

ALTERNATE EMERGENCY COORDINATOR:

NAME Cliff Moll
HOME ADDRESS 1966 Crestdale Drive
Stow, OH
HOME PHONE (216) 688-0068

FIRST AID LEADER:

NAME Joe Jakovcic
HOME ADDRESS 17027 Raccoon Trail
Strongsville, OH
HOME PHONE (216) 572-3989

FIRE RESPONSE TEAM LEADER:

NAME Don Ellis
HOME ADDRESS 9164 Weaver Road
Ravenna, OH 44266
HOME PHONE (216) 626-5259

ASSIGNMENTS
(CONT'D)

ASSEMBLY POINT LEADERS:

OFFICE:

NAME Diane Boerwinkle
HOME ADDRESS 16321 Raymond Street
Maple Heights, OH
HOME PHONE (216) 475-2371

YARD:

NAME John Jakovcic
HOME ADDRESS 17027 Raccoon Trail
Strongsville, OH
HOME PHONE (216) 572-3989

WAREHOUSE:

NAME Don Ellis
HOME ADDRESS 9164 Weaver Road
Ravenna, OH 44266
HOME PHONE (216) 626-5259

IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VAN WATERS & ROGERS, INC.

1. BRANCH MANAGER:

NAME Cliff Moll
ADDRESS 1966 Crestdale Drive
Stow, OH
PHONE - OFFICE (216) 292-7500
HOME (216) 688-0068

2. BRANCH OPERATIONS MANAGER:

NAME Ed Welsh
ADDRESS 1466 Bradford Street
Macedonia, OH
PHONE - OFFICE (216) 292-7500
HOME (216) 626-2514

3. AREA MANAGER:

NAME Russ Metzger
ADDRESS 4018 Medina Rd.
Twinsburg, OH
PHONE - OFFICE (513) 563-2440
HOME (216) 425-4330

4. REGIONAL ENVIRONMENTAL AND OPERATIONS MANAGER:

NAME Mark S. Kirkland
ADDRESS 819 Kimberly Way
Lisle, IL
PHONE - OFFICE (312) 573-4300
HOME (312) 852-8310

IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VAN WATERS & ROGERS, INC. (CONT'D)

5. REGIONAL REGULATORY MANAGER

NAME Robert D. Hickman
ADDRESS 8 Oriole Court
Naperville, IL
PHONE - OFFICE (312) 573-4300
HOME (312) 369-1317

6. REGIONAL VICE PRESIDENT:

NAME James F. Lacey
ADDRESS 17 W. 726 Butterfield Rd. #115
Oak Brook Terrace, IL. 60181
PHONE - OFFICE (312) 573-4300
HOME (312) 916-1389

Van Waters & Rogers Inc.

subsidary of **Univar**
CERTIFIED MAIL #P952-620-344
RETURN RECEIPT REQUESTED

600 HUNTER DRIVE
OAK BROOK, IL 60521
PHONE (312) 573-4300

October 7, 1988

Ms. Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section 5HR-12
Waste Management Division
U. S. EPA
230 South Dearborn Street
Chicago, IL 60604

RE: Van Waters & Rogers Inc.
Bedford Heights, Ohio, Branch
OHD 071 107 791

RECEIVED
OCT 11 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Ms. Swanson:

Enclosed is a revised waste analysis plan as requested by your letter dated September 23, 1988. Revisions in our waste analysis plan are needed to comply with the requirements of 40 CFR Part 268. The waste analysis plan includes discussion and documentation of how we verify that restricted wastes are treated, stored, or disposed of in accordance with the prohibitions of 40 CFR Part 268.

If you have any questions or need additional information concerning our waste analysis plan, please feel free to call me.

Very truly yours,



James P. Hooper
Regional Regulatory Manager
Central Region

JPH:be

Enclosure

IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VW&R

1. BRANCH MANAGER:

Name Cliff Moll

Address 1966 Crestdale Drive

Stow, OH

Phone - Office (216) 292-7500

Home (216) 688-0068

2. BRANCH OPERATIONS MANAGER:

Name Ed Welsh

Address 1466 Bradford Street

Macedonia, OH

Phone - Office (216) 292-7500

Home (216) 626-2514

3. AREA MANAGER:

Name Dean A. Sievers

Address 4397 Bromyard

Cincinnati, OH

Phone - Office (513) 563-2440

Home (513) 779-1354

4. REGIONAL OPERATIONS/SAFETY MANAGER:

Name Mark S. Kirkland

Address 819 Kimberly Way

Lysle, Illinois

Phone - Office (312) 573-4322

Home (312) 852-8310

IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VW&R (cont't.)

5. REGIONAL OPERATIONS STAFF:

Name Thomas E. Nisler

Address 1051 Whitchurch Court
Wheaton, Illinois

Phone - Office (312) 573-4320

Home (312) 653-1270

Name Robert D. Hickman

Address 8 Oriole Court
Naperville, Illinois

Phone - Office (312) 573-4334

Home (312) 369-1317

Name _____

Address _____

Phone - Office _____

Home _____

6. REGIONAL VICE PRESIDENT:

Name James Lacey

Address *

*

Phone - Office (312) 573-4305

Home *

* In the process of moving/transferring...
this information not available at this
time.

3-4530
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IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VW&R (cont't.)

One of the VW&R managerial and staff personnel listed below must be contacted in the event of an extreme emergency if one of the regional personnel cannot be contacted.

1. HOME OFFICE OPERATIONS:

VICE PRESIDENT:

Name Daniel McCaskill

Address 2600 Campus Drive

San Mateo, CA

Phone - Office (415) 573-8000

Home (415) 435-2489

ENGINEERING DIRECTOR:

Name _____

Address _____

Phone - Office _____

Home _____

TECHNICAL DIRECTOR:

Name Douglas E. Eisner

Address 2600 Campus Drive

San Mateo, CA

Phone - Office (415) 573-8000

Home (415) 937-7708

IV. EMERGENCY TELEPHONE NUMBERS

A. WITHIN VW&R (cont't.)

2. OTHER:

VICE PRESIDENT:

Name _____

Address _____

Phone - Office _____

Home _____

PRESIDENT:

Name Robert A. Steinseifer

Address 2600 Campus Drive

San Mateo, CA

Phone - Office (415) 573-8000

Home (415) 867-5631

B. LOCAL AUTHORITIES:

1. Police: Name Bedford Heights Phone (216) 439-1234

2. Fire Dpt.: Name Bedford Heights Phone (216) 439-1212

3. Ambulance: Name Bedford Heights Phone (216) 439-1212

4. Hospital: Name Suburban Community Phone (216) 491-6112

5. Chemtrec: _____

C. REGULATORY AGENCIES:

STATE ENVIRONMENTAL CONTACT:

Name Steve Tuckerman

Phone (216) 425-9171

C. REGULATORY AGENCIES (continued):

FEDERAL EPA CONTACT:

Name Kathy Homer

Phone (312) 886-4023

Branch Federal EPA ID Number OH071107791 (generator)

D. ADJACENT NEIGHBORS:

Name Union Paper & Twine Phone (216) 292-5700

Address 26401 Richmond Road; Bedford Heights, OH 44146

Name B&B Wood Products Phone (216) 292-6555

Address 26555 Richmond Road; Bedford Heights, OH 44146

Name Converter Corporation Phone (216) 464-4244

Address 26691 Richmond Road; Bedford Heights, OH 44146

Name Jorgenson Steel Phone (216) 292-5555

Address 26400 Richmond Road; Bedford Heights, OH 44146

E. OUTSIDE CONTRACTOR HELP:

Listed below are industrial cleanup companies identified to assist in the cleanup of a chemical spill:

Name Erieway Pollution Control Phone (216) 2955

Address 33 Industry Drive; Bedford Heights 44146

EPA ID No. _____

Name _____ Phone _____

Address _____

EPA ID No. _____

IV. EMERGENCY TELEPHONE NUMBERS (continued):

F. TRANSPORTER (outside):

Listed below are common carriers that can be of assistance in transporting hazardous materials/wastes:

Name Schneider Tank Lines Phone 1-800-558-5091

Address Appleton, WI

EPA ID No. WID023463128

Name Branch Motor Express Co Phone 1-800-221-3863
(except Ohio)

Address New York, NY 1-800-522-5208
(in New York)

EPA ID No. NYD001669803

V. TRAINING

A. ALL EMPLOYEES OF THE BRANCH ARE TO BE FAMILIAR WITH THE CONTENTS OF THIS PLAN. THEY MUST KNOW THE PRIMARY AND SECONDARY EXITS WITHIN THEIR RESPECTIVE WORK AREAS, AS WELL AS THE LOCATION OF FIRE EXTINGUISHERS AND FIRST AID KITS THEY MAY UTILIZE IN CASE OF AN EMERGENCY. THIS TRAINING IS TO BE DOCUMENTED AND REVIEWED AT LEAST ANNUALLY.

RUN-THROUGHS OF THE BRANCH'S EMERGENCY RESPONSE PLAN ARE TO BE CONDUCTED AT LEAST SEMI-ANNUALLY; THESE DRILLS ARE TO BE DOCUMENTED TO INCLUDE A DESCRIPTION OF EACH TEST, ITS RESULTS, AND RECOMMENDATIONS FOR ANY CHANGES AND IMPROVEMENTS. PROCEDURES ARE OUTLINED IN THE REGION'S TAB 6.

B. SPECIFIC BRANCH PERSONNEL ARE TO BE TRAINED IN:

<u>SUBJECT</u>	<u>SAFETY TRAINING, MANUAL TAB NO.</u>
A. FIRST AID	17
B. USE OF RESPIRATORS & SELF- CONTAINED BREATHING APPARATUS	33
C. USE OF FIRE EXTINGUISHERS	11

C. ALL BRANCH PERSONNEL WITH "HANDS-ON" CONTACT WITH HAZARDOUS MATERIALS AND HAZARDOUS WASTES ARE TO RECEIVE APPROPRIATE TRAINING BY REGIONAL OPERATIONS PERSONNEL. THIS WILL INCLUDE AT LEAST THE BRANCH OPERATIONS MANAGER AND ALL WAREHOUSEMEN AND DRIVERS. ALL NEW EMPLOYEES ARE TO RECEIVE THIS TRAINING WITHIN SIX WEEKS OF HIRE, AND IT IS TO BE REPEATED/REVIEWED AT LEAST ANNUALLY. A COPY OF THE CONTENTS OF THE TRAINING PROGRAM IS PART OF THE APPENDIX.

ALL EMPLOYEES ARE RECOMMENDED TO ATTEND THESE TRAINING SESSIONS.

VI. EMERGENCY EQUIPMENT

2. TOOLS/MISCELLANEOUS CONT'D.

- ASSORTED BUNGS
- DUCT TAPE
- LEAD WOOL
- STAINLESS STEEL SCREWS (ASSORTED SIZES) WITH RUBBER GASKETS
- SHEET RUBBER AND TEFLON (GASKET MATERIAL)
- BOX WIPING RAGS
- TRANSFER PUMP
- 100" EXTENSION CORD
- BAGS OF SAND AND HYDRATED LIME
- RECOVERY DRUM (65 GALLON)
- 2' - 5' SPADE SHOVELS

B. PALLETIZED -

EQUIPMENT STORED ON A PALLET FOR READY TRANSPORT TO OFF-SITE EMERGENCY MATERIAL IS ALSO AVAILABLE FOR ON-SITE USE, OF COURSE:

- 10 LB. ABC FIRE EXTINGUISHER
- TRIANGLE EMERGENCY MARKERS
- RUBBER GLOVES
- RUBBER APRONS
- RUBBER BOOTS
- HARD HATS WITH FULL FACE SPLASH SHIELD AND CHIN GUARD
- SLICKER SUITS
- PUSH BROOMS
- FLASHLIGHTS AND SPARE BATTERIES
- 100 LB. BAGS OF SAND
- 100 LB. BAGS OF SODA ASH
- PLASTIC LINERS FOR 55 GALLON DRUMS

VI. EMERGENCY EQUIPMENT

THERE ARE THREE BASIC "GROUPINGS" OF EMERGENCY EQUIPMENT TO BE MAINTAINED AT EACH BRANCH:

A. ON SITE -

1. CERTAIN EQUIPMENT IS TO BE STATIONED THROUGHOUT THE BRANCH AT FIXED LOCATIONS:

- FIRE EXTINGUISHERS
- FIRST AID KITS
- RESPIRATORS
- SHOVELS
- BROOMS
- PROTECTIVE CLOTHING
- SELF-CONTAINED BREATHING APPARATUS ("AIR PACK")

DEPENDING ON THE BRANCH,

- CHLORINE KIT A
- CHLORINE KIT B

THE EVACUATION ROUTE PLAN IS MOUNTED IN EASY VIEW AND MUST IDENTIFY THE LOCATION OF THE ABOVE.

2. TOOLS/MISCELLANEOUS ARE KEPT IN A SECURE LOCATION (TOOL LOCKER):

- SCREWDRIVERS
- HAMMERS
- CHANNEL LOCK PLIERS
- NEEDLE-NOSE PLIERS
- LINOLEUM KNIFE
- 1/2" CHISEL
- PIPE WRENCHES (24", 18")
- CRESCENT WRENCHES (12", 10", 6")
- BUNG WRENCHES

VI. EMERGENCY EQUIPMENT (CONT'D)

THE LOCATIONS OF THE EMERGENCY EQUIPMENT AT THIS VW&R
BRANCH ARE DEPICTED ON THE FOLLOWING PAGE.

Revised
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VII. EMERGENCY RESPONSE/EVACUATION

IN THE EVENT OF AN EMERGENCY SITUATION, THE INDIVIDUAL MAKING DISCOVERY OF THE OCCURRENCE IS TO IMMEDIATELY NOTIFY THE EMERGENCY COORDINATOR OR HIS ALTERNATE; IF NEITHER IS AVAILABLE, THE NEXT ALTERNATE LISTED ON THE EMERGENCY PHONE NUMBER LISTING. THE EMERGENCY COORDINATOR, AS DO HIS ALTERNATES, HAVE THE AUTHORITY TO COMMIT COMPANY RESOURCES AND INITIATE REQUESTS FOR ASSISTANCE TO ANY EMERGENCY AGENCY.

THE PHONE NUMBER LISTING AND EMERGENCY PROCEDURES OUTLINED IN THE PLAN ARE POSTED WITHIN THE FACILITY AND ARE KEPT READILY AVAILABLE BY THE LISTED COORDINATOR AND HIS ALTERNATES.

THE DECISION MUST BE MADE BY THE COORDINATOR OR HIS ALTERNATE, WHETHER A SITUATION POSES IMMINENT THREAT TO HUMAN LIFE, HEALTH, OR THE ENVIRONMENT TO SUCH AN EXTENT AS TO REQUIRE EVACUATION OF THE FACILITY OR ONLY A PARTIAL RESPONSE TO THE SITUATION.

SPECIFIC PROCEDURES TO BE FOLLOWED FOR SPECIFIC EMERGENCIES ARE SPELLED OUT IN THE FOLLOWING SECTIONS OF THIS PLAN.

VII. EMERGENCY RESPONSE/EVACUATION

THE FACILITY EVACUATION PROCEDURE IS TO BE IMPLEMENTED BY BRANCH PERSON WHEN IT BECOMES NECESSARY TO EVACUATE THE FACILITY WITH MINIMUM EXPOSURE TO PERSONNEL INJURY OR DAMAGE TO PROPERTY OR TO THE ENVIRONMENT BECAUSE EMERGENCIES SUCH AS FIRE, CHEMICAL SPILL, TOXIC GAS RELEASE, SEVERE WEATHER, AND BOMB THREATS.

WHENEVER THERE IS AN IMMINENT OR ACTUAL CONTINGENCY SITUATION WITHIN THE BRANCH REQUIRING EVACUATION OF THE PREMISES, THE EMERGENCY COORDINATOR (ALTERNATE WHEN EMERGENCY COORDINATOR IS UNAVAILABLE) WILL IMMEDIATELY:

1. NOTIFY THE OCCUPANTS OF THE FACILITY BY SOUNDING THE BRANCH ALARM SYSTEM. ALTERNATE MEANS OF NOTIFICATION WILL BE THE TELEPHONE PAGING SYSTEM OR VOICE COMMUNICATION.
2. INSTITUTE THE BRANCH'S FACILITY EVACUATION PLAN AND CALL INTO ACTION SPECIFIC RESPONSIBLE ASSIGNMENTS.
3. IDENTIFY THE CHARACTER, EXACT SOURCE, AND AMOUNT OF ANY RELEASED MATERIALS. HE WILL DO THIS BY OBSERVATION OR REVIEW OF THE BRANCH'S RECORDS OR MANIFEST. (IN THE VW&R SYSTEM, ALL CONTAINERS ARE LABELED.)
4. ASSESS POSSIBLE HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT THAT MAY RESULT FROM RELEASE, FIRE, OR EXPLOSION. THIS ASSESSMENT WILL CONSIDER BOTH DIRECT AND INDIRECT EFFECTS.
5. TAKE ALL POSSIBLE MEASURES NECESSARY TO INSURE THAT FIRES, EXPLOSIONS, OR RELEASES DO NOT SPREAD TO OTHER HAZARDOUS WASTE AT THE BRANCH.

THESE MEASURES WILL INCLUDE:

- A. STOPPING OPERATIONS
- B. COLLECTING AND CONTAINING RELEASE WASTE
- C. REMOVING OR ISOLATING CONTAINERS

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VII. EMERGENCY RESPONSE/EVACUATION

5. CONT'D.

- D. MONITORING FOR LEAKS
 - E. MONITORING FOR PRESSURE BUILDUP
 - F. MONITORING FOR GAS GENERATION
 - G. MONITORING FOR RUPTURES IN VALVES, PIPES, OR
OTHER EQUIPMENT.
6. PROVIDE FOR TREATING, STORING, OR DISPOSING OF RECOVERED WASTE, CONTAMINATED SOIL OR SURFACE WATER, OR ANY OTHER MATERIAL THAT RESULTS FROM RELEASE, FIRE, OR EXPLOSION AT THE BRANCH.
7. INSURE THAT IN THE AFFECTED AREAS OF THE BRANCH:
- A. NO WASTE THAT MAY BE INCOMPATIBLE WITH THE
RELEASED MATERIAL IS TREATED, STORED, OR
DISPOSED OF UNTIL CLEAN UP PROCEDURES ARE
COMPLETED.
 - B. ALL EMERGENCY EQUIPMENT IS CLEANED AND FIT
FOR ITS INTENDED USE BEFORE OPERATIONS ARE
RESUMED.
8. AS REQUIRED, ARRANGE FOR NOTIFICATION OF FEDERAL, STATE, AND
LOCAL AUTHORITIES THAT THE BRANCH IS IN COMPLIANCE WITH
- PARAGRAPH (7) BEFORE OPERATIONS ARE RESUMED IN AFFECTED AREAS
OF THE BRANCH.

MEANWHILE, ALL PERSONNEL WITH NO SPECIFIC RESPONSIBILITIES WILL LEAVE BY
THE NEAREST MARKED EXIT (SEE EVACUATION MAP) AND PROCEED IMMEDIATELY VIA
THE SAFEST ROUTE TO THEIR ASSIGNED ASSEMBLY AREA, REPORTING TO THE AREA
GROUP LEADER.

ONCE BRANCH PERSONNEL HAVE CLEARED THE FACILITY AND HAVE CONGREGATED IN
THEIR ASSIGNED LOCATIONS, THE GROUP LEADER WILL TAKE A HEAD COUNT, MAKING

VII. EMERGENCY RESPONSE/EVACUATION

SURE ALL PERSONNEL ARE ACCOUNTED FOR. HE WILL KEEP THE GROUP TOGETHER AND AWAIT INSTRUCTIONS FROM THE EMERGENCY COORDINATOR.

ONCE THE EMERGENCY HAS CLEARED, HE WILL CONTROL THE RETURN OF HIS GROUP TO THEIR WORK LOCATIONS.

PERSONNEL OPERATING ELECTRICAL EQUIPMENT AT THE TIME OF THE ALARM WILL TURN OFF THE MACHINE - AND UNPLUG IT IF POSSIBLE.

VEHICLE AND LIFT OPERATORS WILL CLEAR THEIR EQUIPMENT FROM ALL AISLES AND EXITS.

FURTHER ACTION WILL DEPEND UPON THE NATURE OF THE EMERGENCY:

- FIRE
- CHEMICAL SPILL
- TOXIC GAS RELEASE
- STORM, FLOOD
- BOMB THREAT

VIII. EMERGENCY - FIRE

THE MOST PROBABLE CAUSE FOR EVACUATION OF THE PREMISES : = THIS BRANCH IS FIRE.

IT IS IMPORTANT THAT ALL EMPLOYEES NEVER FORGET THAT FIREFIGHTING REQUIRES PROFESSIONAL ACTION. CALL THE EMERGENCY FIRE NUMBER FOR HELP. HOWEVER, BRANCH PERSONNEL WILL FOLLOW THIS PROCEDURE:

1. ONCE A FIRE SITUATION BREAKS OUT, SUPERVISORY PERSONNEL OR THE BRANCH OFFICE MUST BE ALERTED AND GIVEN THE FOLLOWING INFORMATION:
 - A. NAME OF REPORTING PERSON
 - B. LOCATION OF FIRE
 - C. NECESSITY OF FIRE TRUCK, AMBULANCE, POLICE OR ANY OTHER EMERGENCY VEHICLE OR EQUIPMENT
THESE WILL BE CALLED IMMEDIATELY.
 - D. ANY OTHER INFORMATION DEEMED NECESSARY
2. IF IN THE JUDGEMENT OF THE EMERGENCY COORDINATOR THE SITUATION CALLS FOR THE IMPLEMENTATION OF THE FACILITY EVACUATION PLAN, HE WILL NOTIFY IMMEDIATELY THE OCCUPANTS OF THE FACILITY BY FIVE SHORT BLASTS ON THE EMERGENCY WARNING SIGNAL, OR BY THE TELEPHONE SYSTEM, OR BY VOICE COMMUNICATION.
3. UPON NOTIFICATION OF EVACUATION, ALL PERSONNEL WITH NO EMERGENCY RESPONSIBILITIES WILL LEAVE THE PREMISES BY THE NEAREST SAFE EXIT (AS NOTED ON THE EVACUATION MAP) AND REPORT TO HIS ASSEMBLY POINT LEADER. VEHICLE AND FORKLIFT OPERATORS WILL CLEAR THEIR EQUIPMENT FROM AISLES AND EXITS, IF POSSIBLE, AND WILL MAKE SURE ALL ENGINES AND MOTORS ARE TURNED OFF.

VIII. EMERGENCY - FIRE CONT'D.

4. IN THE EVENT OF FIRE, THE EMERGENCY COORDINATOR MUST MAKE AN ASSESSMENT AS TO THE NUMBER OF DIFFERENT POTENTIAL PROBLEMS OR SITUATIONS WHICH MIGHT PRESENT THEMSELVES IN AN EMERGENCY, AND HOW TO DEAL WITH THEM. CONSIDERATION MUST BE GIVEN TO ITEMS SUCH AS:
 - RELEASE OF FUMES AND POSSIBLE NECESSITY FOR NEIGHBOR EVACUATION
 - POTENTIAL MATERIALS WHICH WHEN EXPOSED TO FIRE COULD EXPLODE AND RESULT IN FLYING DEBRIS WHICH COULD SPREAD FIRE TO OFF-SITE AREAS OR PREVIOUSLY UNAFFECTED AREAS AT THE FACILITY
 - EXPLOSIONS WHICH COULD RESULT IN THE RELEASE OF MATERIALS FROM CONTAINERS
 - RESIDUES FROM FIREFIGHTING ACTIVITIES WHICH MAY REQUIRE TO BE CONTAINED AND DEALT WITH IN AN APPROPRIATE MANNER IF DEEMED HAZARDOUS
5. ALL INDIVIDUALS ARE RESPONSIBLE TO FAMILIARIZE THEMSELVES WITH THE CONTENT OF THIS PLAN PLUS THE PRIMARY AND SECONDARY EXITS WITHIN THEIR WORK AREAS, AS WELL AS THE LOCATION OF FIRE EXTINGUISHERS AND FIRST AID KITS THAT MAY BE UTILIZED IN CASE OF AN EMERGENCY. PERSONNEL OPERATING ELECTRICAL EQUIPMENT AT THE TIME THE EVACUATION NOTICE IS GIVEN, WILL BE RESPONSIBLE TO TURN THAT MACHINE OFF AND IF POSSIBLE, UNPLUG IT.

IX. EMERGENCY PLAN - CHEMICALS SPILLS

THE EMERGENCY COORDINATOR MUST MAKE AN ASSESSMENT AND TAKE ACTION WHERE NECESSARY TO ALLEVIATE RISK IN SPILL SITUATIONS. CONSIDERATION MUST BE GIVEN TO THE FOLLOWING POTENTIAL THREATS INVOLVING HAZARDOUS MATERIALS AND HAZARDOUS WASTES:

- THE POTENTIAL FOR THE RELEASED MATERIAL BEING A FLAMMABLE LIQUID WHICH WOULD POSE A FIRE HAZARD.
- THE POSSIBILITY OF GROUND CONTAMINATION WHICH WOULD REQUIRE REMOVAL AND PROPER DISPOSAL OF SOIL SHOWING SUCH CONTAMINATION.
- DEALING WITH SURFACE WATER WHICH MAY BECOME MIXED WITH THE RELEASED MATERIAL.
- AWARENESS AND GUARDING FOR POTENTIAL IGNITION SOURCES AND DETERMINING WHETHER THE RELEASE OF FUMES COULD POSE A FIRE AND/OR EXPLOSION HAZARD WHICH MIGHT NECESSITATE NEIGHBOR EVACUATION.

IX. EMERGENCY PLAN - CHEMICAL SPILLS

A. PROCEDURE:

1. RESCUE INJURED, REMOVE TO SAFE AREA AND ADMINISTER FIRST AID.
2. IF NECESSARY, IMPLEMENT THE FACILITY EVACUATION PROCEDURE.
3. ACTIVATE THE EMERGENCY REACTION PROCEDURE TO DEAL WITH THE CHEMICAL AS THE SITUATION DICTATES.
4. A. IF THE SPILL IS A LIQUID ACID CORROSIVE, A DIKE OF SODA ASH OR SODIUM BICARBONATE WILL BOTH CONTAIN AND NEUTRALIZE THE LIQUID. IF THE SPILL IS A MAJOR ONE, SAND SHOULD BE USED FOR A DIKING/CONTAINMENT MATERIAL.
- B. IF THE SPILL IS A LIQUID CORROSIVE BASE, (E.G., CAUSTIC SODA, CAUSTIC POTASH, AQUA AMMONIA), A DIKE OF BORIC ACID WILL BOTH CONTAIN AND NEUTRALIZE THE LIQUID. IF THE SPILL IS A MAJOR ONE, SAND SHOULD BE USED FOR A DIKING/CONTAINMENT MATERIAL.
- C. IF THE SPILL IS A NON-CORROSIVE LIQUID (E.G., FLAMMABLES, CHLORINATED SOLVENTS, GLYCOLS), USE SAND OR MUD TO DIKE/CONTAIN THE SPILL AND ABSORB THE MATERIAL.
- D. IF THE SPILL IS A SOLID, CLEAN UP THE SPILL AND PLACE IT IN A CONTAINER.

UNDER NO CIRCUMSTANCES WASH DOWN ANY SPILL WITHOUT FIRST CONFERRING WITH THE REGIONAL OR HOME OFFICE OPERATIONS STAFF.

IX. EMERGENCY PLAN - CHEMICAL SPILLS (CONT'D)

A. PROCEDURE (CONT'D)

5. SOME GENERAL RULES OF HANDLING INDUSTRIAL SPILLS:

- A. KEEP FOUR THINGS IN MIND -- CONTROL, CONTAIN, CLEAN-UP, AND COMMUNICATION.
- B. KEEP SPECTATORS AWAY FROM SPILL.
- C. NO MATTER WHAT THE MATERIAL -- DO NOT ALLOW SMOKING IN THE AREA.
- D. BE ALERT FOR OTHER IGNITION SOURCES.
- E. WHENEVER POSSIBLE, TRANSFORM SMALL LIQUID SPILL INTO A SOLID STATE AND THEN PROCEED AS IF IT WERE A SOLID.

B. NOTIFICATION:

- 1. NOTIFY MEMBER OF REGIONAL OPERATIONS STAFF IMMEDIATELY.
- 2. FOR OPERATIONAL ASSISTANCE, IF NO ONE IN REGIONAL OPERATIONS IS AVAILABLE CONTACT MEMBER OF HOME OFFICE OPERATIONS STAFF.
- 3. IT WILL BE THE RESPONSIBILITY OF THE REGIONAL STAFF TO NOTIFY STATE AND FEDERAL AGENCIES.
- 4. IT WILL BE THE RESPONSIBILITY OF THE BRANCH/PLANT MANAGEMENT TO NOTIFY LOCAL OFFICIALS AS APPLICABLE.
- 5. CONTACT COMPANIES PREVIOUSLY IDENTIFIED TO ASSIST WITH SPILL CONTAINMENT, CLEAN-UP, AND DISPOSAL, AS APPLICABLE.

IX. EMERGENCY PLAN - CHEMICAL SPILLS (CONT'D)

C. HAZARDOUS CHEMICALS CLASSIFICATION:

LISTED BELOW IS A GENERAL CLASSIFICATION OF THE HAZARDOUS CHEMICALS THAT WE DISTRIBUTE:

1. OXIDIZERS; FOR EXAMPLE

AMMONIUM NITRATE

SODIUM NITRATE

CALCIUM HYPOCHLORITE (HTH)

SODIUM NITRITE

POTASSIUM PERMANGANATE

HYDROGEN PEROXIDE

THESE MATERIALS YIELD OXYGEN READILY TO STIMULATE THE BURNING OF COMBUSTIBLE MATERIALS AND FUELS. IF SPILLED, THEY SHOULD BE KEPT FROM COMING INTO CONTACT WITH FLAMMABLE LIQUIDS AND OTHER COMBUSTIBLE MATERIALS.

CHLORATES, PERCHLORATES, NITRATES, AND PEROXIDES CONTAIN LABILE OXYGEN AND WHEN HEATED OR SUBJECTED TO STRONG SHOCKS, CAN DECOMPOSE WITH AN EXPLOSIVE FORCE. IF THESE MATERIALS OR THEIR CONTAINERS ARE INVOLVED IN A FIRE, PERSONNEL SHOULD BE EVACUATED FROM THE SCENE.

2. POISONS

SOME POISONS, SUCH AS THE CYANIDES, ARE EXTREMELY TOXIC AND VERY SMALL QUANTITIES CAN CAUSE IMMEDIATE ILLNESS OR DEATH. EVACUATE PERSONNEL FROM THE IMMEDIATE AREA. IF POSSIBLE, CONFINE SPREAD OR FLOW OF MATERIALS TO THE IMMEDIATE AREA. PERSONNEL CONTACTED BY MATERIAL MUST WASH IMMEDIATELY, REMOVE CONTAMINATED CLOTHING AND OBTAIN IMMEDIATE MEDICAL ATTENTION.

IX. EMERGENCY PLAN - CHEMICAL SPILLS (CONT'D)

C. HAZARDOUS CHEMICALS CLASSIFICATION (CONT'D)

3. CORROSIVES

ACETIC ACID

SULFURIC ACID

CAUSTIC SODA

HYDROCHLORIC ACID (MURIATIC)

CALCIUM HYPOCHLORITE

NITRIC ACID

WHEN CORROSIVE MATERIAL CONTACTS OTHER HAZARDOUS MATERIALS SUCH AS FLAMMABLES, OXIDIZERS, ETC., VIOLENT REACTIONS, FIRE AND ERUPTIONS CAN OCCUR. SPILLS OF THESE MATERIALS MAY LIBERATE LARGE VOLUMES OF FUMES THAT ARE TOXIC AND CAN CAUSE EYE, SKIN, AND RESPIRATORY INJURY. PERSONNEL SHOULD EVACUATE AREA OF FUME CLOUDS AND AVOID CONTACT WITH THE MATERIAL.

MOST CORROSIVES WILL GENERATE HEAT WHEN CONTACTED BY WATER AND MAY ERUPT AND VIOLENTLY FUME.

SPILLS SHOULD BE CONFINED IF POSSIBLE, TO PREVENT MIXING WITH OTHER MATERIALS OR CONTAMINATION OF STREAMS AND PROPERTY.

PERSONNEL COMING INTO CONTACT WITH THESE MATERIALS SHOULD WASH WITH WATER FOR FIFTEEN MINUTES, IMMEDIATELY REMOVE CONTAMINATED CLOTHING AND SHOES AND OBTAIN MEDICAL ATTENTION.

IX. EMERGENCY PLAN - CHEMICAL SPILLS (CONT'D)

C. HAZARDOUS CHEMICALS CLASSIFICATION (CONT'D)

4. FLAMMABLES

METHANOL

ISOPROPYL ALCOHOL ANHYDROUS

ACETONE

METHYL ETHYL KETONE

TOLUENE

METHYL ISOBUTYL KETONE

FLAMMABLE VAPORS WHEN SPILLED AT TEMPERATURES ABOVE THEIR FLASH POINTS WILL IGNITE WHEN CONTACTED WITH AN OPEN FLAME, SPARKS, OR HOT SURFACES. THEIR VAPORS ARE OFTEN HEAVIER THAN AIR AND WILL FLOW TO LOW PLACES AND USUALLY DOWN HILL. VAPOR CLOUDS WHEN IGNITED BURN RAPIDLY SPREADING FLAME BACK TO THE SOURCE OF THE SPILL. CONTACT WITH CORROSIVE MATERIALS MAY CAUSE IGNITION AND SHOULD BE PREVENTED. ACTION SHOULD BE TAKEN TO KEEP IGNITION SOURCES OUT OF THE AREA OF VAPOR CLOUDS.

X. TOXIC GAS RELEASE

A. PROCEDURE:

1. RESCUE INJURED, REMOVE TO A SAFE AREA AND ADMINISTER FIRST AID.
2. IF NECESSARY, IMPLEMENT THE FACILITY EVACUATION PROCEDURE.
3. ACTIVATE THE EMERGENCY REACTION PROCEDURE TO DEAL WITH THE CHEMICAL AS THE SITUATION DICTATES.
4. USING TRAINED PERSONNEL WITH THE PROPER PROTECTIVE EQUIPMENT, STOP THE PRODUCT RELEASE IF POSSIBLE.
5. SOME GENERAL RULES OF HANDLING TOXIC GAS RELEASES:
 - A. KEEP SPECTATORS AWAY FROM RELEASE
 - B. NO MATTER WHAT THE MATERIAL - DO NOT ALLOW SMOKING IN THE AREA

B. NOTIFICATION:

1. NOTIFY REGIONAL/HOME OFFICE OPERATIONS STAFF.
2. IT WILL BE THE RESPONSIBILITY OF THE REGIONAL STAFF TO NOTIFY STATE AND FEDERAL AGENCIES.
3. IT WILL BE THE RESPONSIBILITY OF THE BRANCH/PLANT MANAGEMENT TO NOTIFY LOCAL OFFICIALS AS APPLICABLE.
4. CONTACT COMPANIES PREVIOUSLY IDENTIFIED TO ASSIST WITH THE SPILL CONTAINMENT, CLEAN-UP, AND DISPOSAL AS APPLICABLE.

C. TOXIC GAS CLASSIFICATIONS:

LISTED BELOW ARE GENERAL CLASSIFICATIONS OF THE TOXIC GASES THAT WE HANDLE:

1. COMPRESSED GASES - COMPRESSED GASES MAY BE "FLAMMABLE" OR "NON-FLAMMABLE". PERSONNEL SHOULD BE EVACUATED A SAFE DISTANCE FROM THE AREA. AVOID BREATHING GASES.
2. FLAMMABLE GASES -
HYDROGEN SULFIDE
PROPYLENE
PROPANE

X. TOXIC GAS RELEASE

C. TOXIC GAS CLASSIFICATIONS CONT'D.:

2. FLAMMABLE GASES -

THIS MATERIAL USUALLY IGNITES IMMEDIATELY UPON RUPTURE OR SERIOUS LEAK. OTHERWISE, THE GAS CLOUD IS EASILY IGNITED AND WILL RESULT IN RAPID COMBUSTION OF THE ENTIRE CLOUD. FIRES FROM LEAKS IN CONTAINERS THAT CANNOT BE SHUT OFF SHOULD BE ALLOWED TO BURN AND THE CONTAINER KEPT COOL.

3. NON-FLAMMABLE GAS -

ANHYDROUS AMMONIA

CHLORINE

SULPHUR DIOXIDE

THIS MATERIAL CAN CAUSE INJURY OR ASPHYXIATION OF PERSONS ENTERING THE CLOUD. TANKS CONTAINING NON-FLAMMABLE GASES CAN RUPTURE VIOLENTLY WHEN EXPOSED TO INTENSE FIRE CONDITIONS.

XI. STORM, FLOODS

IN THE EVENT OF A SEVERE STORM (E.G., TORNADO), ALL BRANCH PERSONNEL SHOULD TAKE SHELTER IN AN INTERIOR HALLWAY OR ROOM, AWAY FROM WINDOWS. NO ONE SHOULD REMAIN IN THE YARD OR EXPOSED AREA OF THE WAREHOUSE.

IN THE CASE OF FLOODS, OR, MORE LIKELY, HIGH WATER DUE TO RAIN, THE MAJOR PRECAUTION IS TO SHUT OFF THE MAIN POWER PANEL. INVENTORY MUST BE LOOKED TO AND REPOSITIONED AS NECESSARY TO PROTECT IT. THE PRESENCE OF HAZARDOUS WASTES REQUIRES PARTICULAR ATTENTION, AND MAY REQUIRE TRANSPORTING TO ANOTHER LOCATION IN CONCURRENCE WITH EPA RULES.

IN ANY KIND OF SEVERE WEATHER SITUATIONS, RELY ON A BATTERY-POWERED RADIO FOR WEATHER ADVISORIES.

XII. EMERGENCY PLAN - BOMB THREAT

1. THE THREAT

THE TELEPHONE CALL THREAT. (A HIGH PERCENTAGE OF BOMBINGS ARE PRECEDED BY TELEPHONE CALLS.) IN THE EVENT OF A BOMB PHONE CALL:

A. IF POSSIBLE, SECURE THE FOLLOWING INFORMATION. (USE CHECK LIST ON ATTACHED SHEET.)

DATE AND TIME OF CALL.

ANY BACKGROUND NOISE - MUSIC, PEOPLE TALKING, ETC.

LOCATION OF BOMB AND THE TIME IT IS SET TO GO OFF.

WHAT KIND OF BOMB.

WHAT KIND OF PACKAGE.

JUDGE THE VOICE -- DRUGGED OR DRINKING, AGE, SEX, ETC.

ASK FOR CALLER'S NAME AND ADDRESS (YOU MIGHT GET IT).

B. THESE QUESTIONS WILL DETAIN THE CALLER SO A TRACE CAN BE MADE.

TO TRACE A CALL, HAVE ANOTHER EMPLOYEE CALL THE SECURITY OFFICE OF THE TELEPHONE COMPANY ON A DIFFERENT LINE.

C. NOTIFY THE POLICE OF THE THREAT.

D. NOTIFY CORPORATE SECURITY.

2. THE SEARCH TECHNIQUE

DON'T TOUCH, HANDLE, OR MOVE ANY SUSPICIOUS OBJECT.

MAKE A SEARCH FOR SUSPICIOUS PACKAGES, BOXES, OR OBJECTS. HALLS AND TOILETS HEAD THE LIST OF PLACES. MAKE THE SEARCH WHILE WAITING FOR THE POLICE TO ARRIVE. HAVE EACH SUPERVISOR AND LEADMAN RESPONSIBLE

XII. EMERGENCY PLAN - BOMB THREAT (CONT'D).

2. THE SEARCH TECHNIQUE (CONT'D)

FOR CERTAIN AREA. A SYSTEMATIC SEARCH WILL ELIMINATE VALUABLE TIME LOSS, AWAITING POLICE ARRIVAL.

REPORT THE FINDINGS OF ANYTHING SUSPICIOUS TO THE POLICE. IF ANYTHING SUSPICIOUS IS FOUND, SET UP A "DANGER ZONE" AND EVACUATE ALL PERSONNEL FROM THIS ZONE (MINIMUM OF 300 FEET IN ALL DIRECTIONS). REMOVE FLAMMABLE MATERIALS IF PRACTICAL AND POSSIBLE.

BOMB THREAT CHECK LIST

DATE TIME YOUR NAME

LISTEN FOR BACKGROUND NOISES

DESCRIBE:

CHECK IF HEARD:

MUSIC

PEOPLE TALKING

CARS OR TRUCKS

AIRPLANE

CHILDREN OR BABIES

MACHINE NOISE

TYPING

OTHER

ASK:

WHERE IS THE BOMB?

WHAT TIME IS IT SET TO GO OFF?

WHAT KIND OF BOMB IS IT?

WHAT KIND OF PACKAGE OR BOX?

WHAT IS YOUR NAME?

WHERE DO YOU LIVE?

HOW OLD ARE YOU?

WHEN DID YOU SET THE BOMB?

JUDGE THE VOICE:

MAN WOMAN CHILD AGE DRINKING OTHER

XIII. HAZARDOUS WASTES

ALTHOUGH IT IS RECOGNIZED THAT THE THREAT POSED BY AN EMERGENCY INVOLVING ANY HAZARDOUS WASTES STORED ON THE BRANCH'S PREMISES IS EQUIVALENT CHEMICALLY TO THAT INVOLVING THE VIRGIN VERSION OF THE SAME SOLVENT OR SOLVENT MIXTURE, SOME PROCEDURAL DIFFERENCES APPLY.

IN THE EVENT OF AN EMERGENCY SITUATION INVOLVING HAZARDOUS WASTES, THE EMERGENCY COORDINATOR MUST BE NOTIFIED. HE WILL DETERMINE THE APPROPRIATE MEASURES TO BE IMPLEMENTED (I.E., ALARMS, EVACUATION, ETC.) AND WHICH FEDERAL, STATE, OR LOCAL AGENCIES AS WELL AS FIRE AND POLICE DEPARTMENTS MUST BE CONTACTED.

IN THE EVENT ESPECIALLY OF A RELEASE OR FIRE, THE COORDINATOR MUST TRY TO DETERMINE BY OBSERVATION, FACILITY RECORDS, OR ANALYSIS (IF TIME PERMITS), WHAT IS THE IDENTITY OF THE MATERIAL INVOLVED, EXACT SOURCE, AMOUNT, AND EXTENT OF IMPACT THE RELEASED MATERIAL WILL HAVE FROM A HUMAN AND ENVIRONMENTAL ASPECT.

AN ASSESSMENT OF THE SITUATION MUST BE MADE TO DETERMINE POSSIBLE HAZARDOUS TO HUMAN HEALTH AND/OR THE ENVIRONMENTAL DUE TO THE EMERGENCY SITUATION. THE COORDINATOR MUST LOOK AT ALL POSSIBLE DIRECT AND INDIRECT EFFECTS WHICH MIGHT RESULT FROM THE EMERGENCY. THE COORDINATOR MUST FURTHER DETERMINE WHETHER THE FACILITY PERSONNEL ARE ADEQUATELY EQUIPPED TO DEAL WITH THE SITUATION, OR WHETHER IT IS NECESSARY TO CONTACT OUTSIDE EMERGENCY AGENCIES TO RENDER ASSISTANCE.

THE POTENTIAL INCIDENTS WHICH ARE OF HIGHEST PRIORITY FOR EMERGENCY PLANNING AT THIS FACILITY ARE (1) FIRE AND/OR EXPLOSION, (2) SPILLS OR MATERIAL RELEASES. OTHER NATURAL DISASTERS SUCH AS TORNADOS, EARTHQUAKES, FLOODS, ETC., WOULD BE HANDLED IN SIMILAR RESPONSE

XIII. HAZARDOUS WASTES CONT'D.

MANNERS AS OUTLINED ELSEWHERE IN THIS CONTINGENCY PLAN AS DEEMED APPROPRIATE BY THE EMERGENCY COORDINATOR.

THE OUTSIDE STORAGE YARD WHICH INCLUDES THE DESIGNATED WASTE STORAGE AREA IS ACCESSIBLE BY MEANS OF ENTRY EITHER THROUGH THE WAREHOUSE OR ACROSS THE YARD. THIS AREA IS HARD-SURFACED AND REMAINS UNOBSTRUCTED AT ALL TIMES.

FIRE

PERSONNEL AT THE FACILITY HAVE BEEN PROVIDED INSTRUCTION BY THE LOCAL FIRE DEPARTMENT ON USE AND APPLICATION OF VARIOUS ON-SITE FIRE EXTINGUISHERS FOR FIREFIGHTING EFFORTS UNTIL APPROPRIATE OUTSIDE EMERGENCY TEAMS ARRIVE. THE EFFORTS OF FACILITY PERSONNEL SHALL CENTER ON EXTINGUISHING THE FIRE AND PREVENTING ITS SPREAD.

THE COORDINATOR SHALL ASSURE THAT, IF APPROPRIATE, THE EVACUATION SIGNAL IS GIVEN, AT WHICH TIME ALL PERSONNEL WHO ARE NOT DIRECTLY INVOLVED IN THE INCIDENT CONTROL EFFORTS, ARE TO PROCEED TO THE DESIGNATED CONGREGATION POINT WHICH IS INDICATED ON THE SITE DIAGRAM INCLUDED IN THE CONTINGENCY PLAN. ALL ACTIVITIES SHALL BE CEASED WITHIN THE FACILITY AND EQUIPMENT REMOVED FROM THE BUILDING PROXIMITY AS TIME ALLOWS. POWER SOURCES MUST BE SHUT DOWN. TRAFFIC FLOW AND OUTSIDE OBSERVERS MUST BE CONTROLLED AND THE AREA ISOLATED TO ALLEVIATE POTENTIAL ADDITIONAL IGNITION SOURCES. SHOULD THE MATERIALS WHICH MAY BE AFFECTED BY THE EMERGENCY BE OF SUCH A NATURE AS TO POSE A THREAT OF VIOLENT CONFLAGRATION, EXPLOSION, OR FUME RELEASE, THE COORDINATOR SHALL ADVISE EMERGENCY PERSONNEL AND RENDER ANY ASSISTANCE DEEMED NECESSARY TO IMPLEMENT EVACUATION OF THE SURROUNDING AREA WITHIN 1/4 MILE. ALL EMPLOYEES TRAINED AND PARTAKE IN DRILLS ON EVACUATION PROCEDURES ARE AND INSTRUCTED NOT TO LEAVE THE DESIGNATED

XIII. HAZARDOUS WASTE CONT'D.

CONGREGATION POINT UNLESS SO DIRECTED BY THE PARTY RESPONSIBLE FOR ACCOUNTING FOR ALL EMPLOYEES.

THE EMERGENCY COORDINATOR SHALL MAKE THE JUDGMENT AS TO ALLOW RETURN TO THE BUILDING, OR TO RELEASE PERSONNEL TO LEAVE THE SITE ONCE THE EMERGENCY SITUATION HAS BEEN BROUGHT UNDER CONTROL.

SPILLS

SPILLS OR MATERIAL RELEASES UPON DISCOVERY MUST BE REPORTED TO THE EMERGENCY COORDINATOR OR AN ALTERNATE. IMMEDIATE RESPONSE IS REQUIRED TO MINIMIZE THE IMPACT OF THE RELEASE. THE COORDINATOR MUST ASSESS THE PROPER ACTIONS AND PRECAUTIONS TO BE TAKEN TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT. HE MUST ALSO INITIATE APPROPRIATE ACTIVITY TO IDENTIFY, CONTAIN, COLLECT, AND PROPERLY DISPOSE OF THE MATERIAL.

BECAUSE THIS FACILITY DEALS WITH ONLY CONTAINERIZED MATERIALS IN WASTE FORM, THE AMOUNT OF MATERIAL WHICH HAS POTENTIAL FOR RELEASE FROM ONE CONTAINER IS RELATIVELY SMALL. HOWEVER, PROMPT AND SAFE PROCEDURES MUST BE FOLLOWED BY ALL WITH SUCH A SITUATION, IN AN APPROPRIATE MANNER.

THE COORDINATOR MUST MAKE CONTINUAL ASSESSMENTS AS TO THE POTENTIAL IMPACTS OF THE RELEASE PERTAINING TO FIRE HAZARDS, FUME ESCAPES WHICH MAY NECESSITATE EVACUATION OF THE FACILITY AND/OR NEIGHBORS, INITIATING CLEANUP (AND ASSURING OF THE PROPER UTILIZATION OF SAFETY EQUIPMENT TO UNDERTAKEN THIS ACTIVITY), DETERMINATION OF NECESSITY FOR CALLING IN OF OUTSIDE EMERGENCY AGENCY ASSISTANCE, AND INITIATING THE REQUIRED REPORTING AND DOCUMENTATION OF INCIDENTS (I.E., MATERIAL DESIGNATED BY RQ QUANTITIES AS LISTED UNDER SUPERFUND, SOLID WASTE DISPOSAL ACT, CLEAN AIR ACT, CLEAN WATER ACT, OR TSCA, OR WHICH COULD BE CLASSIFIED AS HAZARDOUS UNDER RCRA).

XIII. HAZARDOUS WASTE CONT'D.

THE SECONDARY CONTAINMENT AREA WILL HOLD MATERIALS ~~RELEASED FROM~~ DRUMS DURING STORAGE, IN SUCH CASES, THE COORDINATOR IS TO BE NOTIFIED AND WILL INITIATE THE APPROPRIATE CLEANUP MEASURES. LIQUID MATERIAL WILL BE REMOVED BY MEANS OF A PORTABLE PUMP, AND PLACED INTO AN APPROPRIATE SPECIFICATION DRUM FOR THE MATERIAL. SHOULD SOIL CONTAMINATION BE EVIDENT, A LAYER OF SOIL SHALL BE REMOVED TO AN ADEQUATE DEPTH TO ASSURE THAT ALL CONTAMINATION IS REMOVED. THE CONTAMINATED SOIL SHALL BE PLACED INTO OPEN-TOP DRUMS AND SEALED FOR DISPOSITION. ALL ACCUMULATED LIQUIDS AND COLLECTED CLEANUP MATERIALS SHALL BE LABELLED AND MARKED AS APPROPRIATE FOR THE MATERIAL. SAMPLES OF RESULTING MATERIALS RELEASED SHALL BE TAKEN IF FOR SOME REASON THERE SHOULD BE ANY QUESTIONS AS TO COMPOSITION OR HAZARD DUE TO MULTIPLE CONTAINER RELEASES, WATER EXTINGUISHING MATERIAL DILUTION, ETC. APPROPRIATE SAFETY EQUIPMENT USAGE SHALL BE ENFORCED DURING ALL OF THESE PROCEDURES. PROPER DOCUMENTATION OF THE INCIDENT IN THE FACILITY RECORDS SHALL BE INITIATED, AND REPORTING OF THE INCIDENT TO FEDERAL, STATE, LOCAL, AND COMPANY PERSONNEL SHALL BE UNDERTAKEN AS APPROPRIATE. IN THE EVENT THAT THE CONTINGENCY PLAN MUST BE IMPLEMENTED AND THE INCIDENT IS REPORTABLE AS DEFINED BY 40 CFR 264.56(J), A WRITTEN REPORT SHALL BE FILED WITH APPROPRIATE FEDERAL, STATE, AND LOCAL AUTHORITIES.

IN ADDITION TO ANY REPORTS REQUIRED BY GOVERNMENT AGENCIES, INCIDENTS WILL BE REPORTED WITH 48 HOURS TO THE REGIONAL OPERATIONS DEPARTMENT LOCATED IN MONTVALE, NEW JERSEY ((201) 573-9480).

COLLECTED MATERIALS FROM A RELEASE SITUATION SHALL BE TYPICALLY DISPOSED OF THROUGH MCKESSON ENVIROSYSTEMS. IN THE EVENT THAT THEY WERE UNABLE TO DEAL WITH THE MATERIALS BASED ON PERMITS AND/OR TECHNOLOGY, AN OUTSIDE DISPOSAL FIRM WOULD BE CONTRACTED WITH TO MAKE DISPOSITION OF THE MATERIAL.

* or another permitted facility

XIII. HAZARDOUS WASTES CONT'D.

IN ANY EVENT, THE COORDINATOR SHALL BE RESPONSIBLE ~~TO ASSURE~~ THAT THE PARTY MAKING DISPOSITION OF THE MATERIAL IS PROPERLY PERMITTED AND HAS THE RESOURCES TO DEAL WITH THE RESIDUALS IN A PROPER FASHION.

IF FOR SOME REASON RELEASED MATERIAL WERE TO ESCAPE THE SECONDARY CONTAINMENT AREA, THE COORDINATOR SHALL INITIATE RESPONSE TO PERSONNEL TO CONTAIN THE MATERIALS BY MEANS OF AN INERT MATERIAL SUCH AS SANDBAGS, HAZORB ABSORBENT, OR STANDARD INDUSTRIAL ABSORBENTS. THE SAME PROCEDURES, EFFORTS, CLEANUP, SAFETY CONSIDERATIONS, ASSESSMENTS, AND DOCUMENTATION/REPORTING REQUIREMENTS SHALL BE FOLLOWED AS WAS OUTLINED IN THE EVENT OF AN OCCURRENCE WITHIN THE SECONDARY CONTAINMENT AREA.

ALL EQUIPMENT USED IN CLEANUP WHICH MAY BECOME CONTAMINATED DURING ACTIVITIES SHALL BE DECONTAMINATED USING MATERIALS APPROPRIATE TO CAUSE REMOVAL OF THE CONTAMINANT. THE RESULTING MATERIAL FROM THIS DECONTAMINATION PROCESS SHALL BE PLACED WITHIN THE RESIDUAL CLEANUP CONTAINERS FOR DISPOSAL, UNLESS IT IS DEEMED INCOMPATIBLE WITH MATERIALS ALREADY CONTAINED IN SUCH VESSEL.

DURING ANY EMERGENCY SITUATION, THE EMERGENCY COORDINATOR MUST TAKE ALL REASONABLE MEASURES NECESSARY TO ENSURE THAT FIRES, EXPLOSIONS, AND RELEASES, DO NOT OCCUR, RECUR, OR SPREAD TO OTHER UNAFFECTED AREAS OF THE FACILITY. THESE MEASURES INCLUDE, WHERE APPLICABLE, STOPPING PROCESSES AND OPERATIONS, COLLECTING AND CONTAINING RELEASED WASTE, AND REMOVAL AND/OR ISOLATING CONTAINERS.

IMMEDIATELY AFTER AN EMERGENCY, THE COORDINATOR MUST PROVIDE FOR TREATING, STORING, OR DISPOSING OF RECOVERED WASTE, CONTAMINATED SOIL OR SURFACE WATER, OR ANY OTHER MATERIAL THAT RESULTS FROM A RELEASE, FIRE, OR EXPLOSION AT THE FACILITY. ASSURANCES MUST BE MADE THAT ALL OF THESE

XIII. HAZARDOUS WASTES CONT'D.

ENDEAVORS ARE UNDERTAKEN IN THE APPROPRIATE MANNER AS GOVERNED BY FEDERAL, STATE, AND LOCAL LAWS. RESIDUAL MATERIAL FROM CLEANUP OPERATIONS SHALL BE PROPERLY STORED, MARKED, LABELLED, AND HANDLED AS TO PREVENT ANY FURTHER INCIDENT.

THE EMERGENCY COORDINATOR OR AN ALTERNATE MUST ENSURE IN AN EMERGENCY SITUATION THAT IN THE AFFECTED AREA OF THE FACILITY, NO WASTE WHICH MIGHT BE OF AN INCOMPATIBLE NATURE WITH THE RELEASED MATERIAL IS STORED UNTIL CLEANUP PROCEDURES ARE COMPLETED.

ALL EMERGENCY EQUIPMENT LISTED IN THE CONTINGENCY PLAN WHICH IS PRESENT AT THE FACILITY AND MAY HAVE BEEN UTILIZED DURING THE EMERGENCY SITUATION MUST BE CLEANED, RECHARGED, INSPECTED, REPLACED, AND FIT FOR USE BEFORE RESUMING NORMAL OPERATIONS.

THIS VW&R FACILITY HAS AN ASSORTMENT OF EMERGENCY EQUIPMENT PRESENT FOR USE IN DIFFERENT SITUATIONS. ON-SITE EMERGENCY EQUIPMENT IS KEPT IN VARIOUS DESIGNATED LOCATIONS WITHIN THE WAREHOUSE, AS WELL AS DRIVER KITS ON EACH TRUCK WHICH CONTAIN SPECIFIC ITEMS WHICH MAY BE UTILIZED IN POTENTIAL EMERGENCY SITUATIONS WHILE ON THE ROAD. A LISTING OF EQUIPMENT AVAILABLE AT THE FACILITY IS INCLUDED IN THIS PLAN.

DEC 22 1986

Wastes Anticipated To Be Handled in Drums At Facility

Van Waters & Rogers Inc.

<u>Chemical</u>	<u>Hazard</u>	<u>Basis For Hazard Designation</u>
Tetrachloroethylene	Toxic	Listed waste F001, F002
Trichloroethylene	Toxic	Listed waste F001, F002
Methylene Chloride	Toxic	Listed waste F001, F002
1,1,1 Trichloroethane	Toxic	Listed waste F001, F002
Carbon Tetrachloride	Toxic	Listed waste F001
Chlorinated Fluorocarbons	Toxic	Listed waste F001, F002
Xylene	Ignitable	Listed waste F003
Acetone	Ignitable	Listed waste F003
Ethyl Acetate	Ignitable	Listed waste F003
Ethyl Ether	Ignitable	Listed waste F003
Methyl Isobutyl Ketone	Ignitable	Listed waste F003
n-Butyl Alcohol	Ignitable	Listed waste F003
Cyclohexanone	Ignitable	Listed waste F003
Methanol	Ignitable	Listed waste F003
Toluene	Toxic, Ignitable	Listed waste F005
Methyl Ethyl Ketone	Toxic, Ignitable	Listed waste F005
Isobutanol	Toxic, Ignitable	Listed waste F005

The above will also be expected in the form of blends with each other, still in drums.

Revised

DEC 22 1986

XIV. EMERGENCY PRESS RELATIONS

THE FOLLOWING IS A SYNOPSIS OF THE EMERGENCY PRESS RELATION POLICY FROM THE HOME OFFICE OPERATIONS MANUAL (REF: 10.21). IT IS INCLUDED ONLY AS A QUICK REFERENCE IN CASE OF AN EMERGENCY WHEN YOU MUST DEAL WITH THE PRESS AND THE HOME OFFICE OPERATIONS MANUAL IS NOT AVAILABLE.

1. IF THE EMERGENCY INVOLVES LOCAL FIRE, POLICE, OR HOSPITAL AUTHORITIES AND IS LIKELY TO BE REPORTED IN THE PRESS, IT IS USUALLY TO THE ADVANTAGE OF THE COMPANY TO GIVE THE PRESS A BRIEF STATEMENT OF THE FACT WITHOUT WAITING TO BE ASKED IN ORDER TO PREVENT RUMOR AND DISTORTION OF THE FACTS.
2. SPOKESMEN ARE CAUTIONED NOT TO SPECULATE OR GIVE OPINIONS ON CAUSE, COST, OR OTHER INFORMATION RELATING TO THE EMERGENCY.
3. IN TIME OF DISASTER, REPORTERS AND PHOTOGRAPHERS DESIRING ADMITTANCE TO A COMPANY FACILITY SHOULD BE ESCORTED TO AN ADMINISTRATIVE AREA AND PROVIDED WITH A PLACE TO WORK AND MAKE PHONE CALLS.
4. ALLOW NEWS AND TV PHOTOGRAPHERS TO TAKE PICTURES UNLESS IT VIOLATES SECURITY.
5. IF REPORTERS CANNOT GET FACTS FROM A VW&R REPRESENTATIVE, THEY CAN GET AT LEAST SOME OF THEM READILY (BUT NOT SECOND HAND) FROM THE POLICE, THE CORONER, HOSPITALS, AND THE FIRE DEPARTMENT - AGENCIES THEY CONTACT CONSTANTLY. IF REPORTERS HAVE TO TRY TO PRY "FACTS" FROM SOME BYSTANDER WHO MORE THAN LIKELY DOES NOT KNOW THE FACTS (BUT IS USUALLY DELIGHTED TO TALK ANYWAY), THE STORY COULD BE HIGHLY COLORED AND INACCURATE.
6. THE WRONG ANSWER, OR A TOO-HASTY, CURT, EVASIVE, OR OFF-THE-CUFF ANSWER, COULD DO HARM TO THE COMPANY AND ITS GOOD REPUTATION WITH THE PUBLIC.
7. NO ANSWER AT ALL, OR A BLUNT "NO COMMENT" IS OFTEN THE WORST POSSIBLE RESPONSE. THERE IS A GENERAL IMPRESSION THAT BEHIND THE STATEMENT "NO COMMENT" HIDE THE GUILTY, THE FRIGHTENED, OR THE INTIMIDATED.

DEC 22 1964

XIV. EMERGENCY PRESS RELATIONS CONT'D.

8. EXPERIENCED REPORTERS KNOW THAT OCCASIONALLY THERE ARE DEVELOPMENTS WHICH MUST BE KEPT CONFIDENTIAL FOR A TIME. IF THAT IS THE SITUATION, EXPLAIN FULLY AND CLEARLY THE REASON WHY THE ANSWER CANNOT BE GIVEN, AND ASSURE REPORTERS THAT THEY WILL BE INFORMED AS SOON AS INFORMATION IS AVAILABLE.
9. IF REPORTERS WANT TO QUOTE YOU BY NAME, THERE IS USUALLY NO REASON WHY THEY SHOULD NOT DO SO.